

# EXHIBIT B

Diego Armando Arroyo Garcia

I am Diego Armando Arroyo Garcia and I am more than 18 years of age. I am competent to testify about the matters stated herein and, under penalty of perjury of the laws of the United States of America, I swear that the following statements are true and correct:

1. I was born on August 2, 1986. Spanish is my first language. I speak and understand very limited English.
2. I attended three semesters of college.
3. I come from Yuriria, Mexico which is a small city in central Mexico in the state of Guanajuato. That is where I am currently living.
4. Many people in my area are farmers or small business owners, and most families, including mine, do not have very much money.
5. In my town in Mexico, the mail is slow and very unreliable. It is difficult and expensive for me to make international calls or to send international faxes. I know most of the other GLK workers also live in small towns where mail is not reliable, and it is difficult and expensive to make international calls or to send international faxes.
6. I do not understand my legal rights in the United States.
7. I first worked for Great Lakes Kraut or "GLK" in 2011.
8. There were about 100 workers from Mexico at GLK in 2011. The majority of us were trim line operators, which means we cut the stem out of heads of cabbage using drills and knives. A few visa workers from Mexico also helped the cook prepare meals and operated a forklift. The H-2B workers traveled together in groups from Wisconsin to Mexico. We all lived in dormitory buildings very near the GLK plant. We worked together and ate all of our meals together.
9. I do not know the full names and addresses in Mexico of many of the visa workers.

## **Expenses for 2011 Employment**

10. I first heard about the job from Elias Vera. I went to Elias's house in approximately June of 2011 with my uncle, Rafael Arroyo Lopez, my cousin, Jesus Ricardo Arroyo Martinez, and my friend, Ramon Martinez Palmas. Elias Vera told us that he worked for GLK and he was in charge of finding workers.

11. Elias told me and my uncle that we would work until mid-November, and that GLK would reimburse us for any expenses we had to get to Wisconsin to work.

12. Elias told me that in order to work for GLK in 2011, I had to pay him \$14,000 Mexican pesos, give him a copy of my passport and take a bus with other workers from Santiago Capitiro, Mexico to Matamoros, Mexico to get our work visas. Elias Vera told me and my uncle that if we did not pay him the money, we would not be able to work at GLK.

13. My cousin, Jesus Ricardo Arroyo Martinez, later told me that Elias Vera made him pay \$14,000 Mexican pesos to work as well.

14. I paid Elias Vera the \$14,000 Mexican pesos in two installments.

15. Following Elias Vera's instructions, I brought him copy of my passport. He said he was going to fax the passport to GLK. A copy of my passport is attached.

16. In early August I took a bus with about 40 other GLK workers from Santiago Capitiro to Matamoros. The bus was arranged by Elias Vera. I knew several of these workers from my town and from nearby towns. I learned from speaking with the other people on the bus that we were all going to work for GLK. It cost me approximately \$100 Mexican pesos to take a taxi from my home to Santiago Capitiro to board the bus, and I paid \$800 Mexican pesos to Elias Vera for this bus. I saw several other GLK workers pay Mr. Vera for the bus.

17. The bus took us to a hotel in Matamoros. I heard that we were one of a few different groups of GLK workers who travelled to Matamoros several days or weeks apart. My group left for Matamoros on approximately August 5, 2011.
18. The owner of the hotel, Hugo, greeted us when we got off the bus and explained to us that we had appointments at the American consulate to get our visas. Hugo also told us that we had to meet with a *licenciado* to help us with our paperwork before going to the consulate.
19. Hugo arranged meetings with the *licenciado* who was named Jorge.
20. The other workers and I went in groups of four in taxis from the hotel to the *licenciado*'s house where he had his office. We each paid \$100 Mexican pesos for the round-trip in the taxis.
21. The *licenciado* helped us fill out paperwork at the office. I paid \$150 Mexican pesos to the *licenciado*. I saw several other workers pay the *licenciado*.
22. We also went in taxis in groups to get our fingerprints taken. We paid approximately \$80 Mexican pesos for the taxis.
23. Before going to get our visas, we each had to give Hugo \$150 U.S. dollars for a *derecho a visa*. After I received my visa, Hugo returned \$150 U.S. dollars to me.
24. The day after meeting with the *licenciado*, we went in groups of about 20 to get our visas. Hugo arranged taxis to the consulate, and we each paid approximately \$80 Mexican pesos for the round-trip in the taxis. We went on one day to be interviewed and then the next day a few workers went back to pick up the visas for everyone. A copy of my visa is attached.
25. After we received our visas and had been at the hotel for a week, Hugo told us that GLK did not want our group of workers in Wisconsin yet and that we had to wait another week.
26. Almost all of the GLK workers stayed at the hotel because it would have cost us at least \$1600 Mexican pesos and taken several days to go home and then return to Matamoros.

27. We stayed at the hotel for about two weeks. Hugo told us when it was time to go to Wisconsin.
28. I paid the hotel \$3,000 Mexican pesos to stay there and for meals there. I saw other workers pay Hugo and his assistant.
29. Hugo gave us our bus tickets. He arranged for taxis to take us to the border. We each paid \$20 Mexican pesos for the taxis to the border.
30. Before entering the United States, all of the workers, including me, had to pay \$6 U.S. dollars as a border entry fee. I saw lots of other workers paying this fee at the border.
31. GLK provided a bus from the American side of the border to Wisconsin. It took about two days to drive to Wisconsin from the border. Although I did not pay for this bus trip, I paid about \$50 U.S. dollars for my food during the two day trip to Wisconsin.
32. We arrived at GLK in Bear Creek on approximately August 22, 2011.
33. We were paid every week at GLK.
34. I spent approximately \$56 U.S. dollars and \$18,330 Mexican pesos in order to work at GLK, including the required recruiting fee; transportation; lodging and meals; and the *licenciado*'s fees. In total, I believe that these expenses amounted to approximately \$1,555 U.S. dollars.
35. I worked 40 hours during my first week of work at GLK in 2011, and was paid approximately \$414.40 gross. A copy of my paycheck for the first week is attached. I spent more money to be able to work at GLK than I was paid for my first week of work.
36. I was never reimbursed for any of the money I paid in order to be able to work at GLK.
37. I talked with many of the other workers about how much it cost to get to work at GLK and that we were not reimbursed. No one I talked to said they were reimbursed.

**Overtime**

38. I do not believe I was properly paid for the overtime I worked during my two last weeks at GLK. My September 18, 2011 paystub indicates that I was paid the regular rate of pay for 49 hours of work; my September 25, 2011 paystub indicates that I was paid the regular rate of pay for 71 hours of work. Copies of my last two paychecks are attached.

39. I talked to several other GLK workers with visas who said they were also paid the regular rate for overtime hours during their last weeks of work.

**Termination**

40. When Elias Vera told me about coming to work for GLK, he said that I would work for four months. I expected to work that entire period in order to make enough money to pay for what I spent to get the job and to earn money. I borrowed \$18,000 Mexican pesos to pay the required expenses.

41. In the middle of September, one of the GLK supervisors named Rafael posted a list in the kitchen of people to be fired. My name was not on this list.

42. Near the end of September, Rafael posted a list of the rest of the visa workers from Mexico, including me, to be fired.

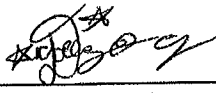
43. The next day, all of the fired visa workers were told to leave GLK on a bus.

### VERIFICATION

I, Diego Armando Arroyo García, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury under the laws of the United States of America that the foregoing statements are true and correct.

Yo, Diego Armando Arroyo García, según 28 U.S.C. § 1746, declaro bajo pena de perjurio bajo las leyes de los Estados Unidos de América que las precedentes declaraciones son verdaderas y correctas.

Date/Fecha: 19 Mayo - 2012

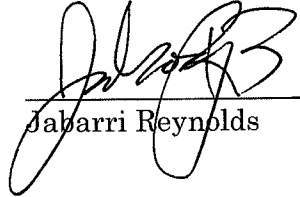
X 

Diego Armando Arroyo Garcia



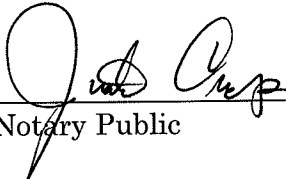
### CERTIFICATION OF COMPREHENSION

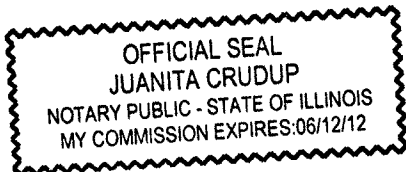
I, Jabarri Reynolds, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury under the laws of the United States of America that I am fluent in the English and Spanish languages and that I read the foregoing Affidavit of Diego Armando Arroyo Garcia in Spanish to Mr. Arroyo Garcia and that he has confirmed that the Affidavit is true and correct.

  
Jabarri Reynolds

Dated: June 8<sup>th</sup>, 2012

SUBSCRIBED and SWORN to before me  
this 8<sup>th</sup> day of June, 2012.

  
Notary Public



Aquarierles



La Secretaría de Relaciones Exteriores de los Estados Unidos Mexicanos solicita a las autoridades competentes, que permitan al titular de este pasaporte de nacionalidad mexicana su libre paso sin retraso u obstáculo alguno y, dado el caso, le otorguen toda la asistencia y protección posibles.

The Ministry of Foreign Affairs of the United Mexican States hereby requests all competent authorities to permit the holder of this passport, a Mexican national, free transit without delay or hindrance and in case of need to give him all lawful aid and protection.

Le Ministère des Affaires Étrangères des États-Unis du Mexique prie les autorités compétentes de bien vouloir laisser passer librement et sans entrave le titulaire du présent passeport, de nationalité mexicaine, et de lui prêter toute aide et assistance possibles.

## A black and white portrait of a man with a mustache, wearing a suit and tie. The image is grainy and appears to be a photocopy or a low-quality scan. The man is looking directly at the camera with a neutral expression. He has dark hair and a prominent mustache. He is wearing a dark suit jacket over a light-colored shirt and a dark tie. The background is light and slightly textured.

Firma del titular  
Holder's signature/Signature du titulaire

1 Tipo	Clave del país de expedición	
Type	Issuing state code	
Categoría	P	Código del país emisor
		MEX
Apellidos / Surname / Nom		
ARROYO GARCIA		
Nombres / Given names / Prénoms		
DIEGO ARMANDO		
Nationalidad / Nationality / Nationalité		
MEXICANA		
Fecha de nacimiento / Date of birth / Date de naissance		
[REDACTED]		
Sexo / (Male / Male) / Sexe		
M		
Lugar de nacimiento / Place of birth / Lieu de naissance		
MÉXICO, D.F.		
Fecha de expedición / Issue date / Date de délivrance		
23 06 2009		
Fecha de caducidad / Expiry date / Date d'expiration		
23 06 2015		

Pasaporte No.  
 Passport No. /  
 No. Passport

Observaciones / Remarks / Observations

CURP / Personal No / No. personal

Lugar / Lieu de naissance

Autoridad / Authority / Autorité

GUANAJUATO



P<MEXARROYO<GARCIA<<DIEGO<ARMANDO<<<<<<<<<<



CO. FILE DEPT. CLOCK NUMBER  
4EI 000106 101552 0013938603 1

005-0002

GREAT LAKES KRAUT CO, LLC  
158 E. NORTHLAND AVE  
APPLETON, WI 54911

## Earnings Statement



Period Beginning: 08/22/2011  
Period Ending: 08/28/2011  
Pay Date: 09/01/2011

Taxable Marital Status: Single  
Exemptions/Allowances:  
Federal: 1  
WI: 1

DIEGO ARMANDO ARROYO GARCIA  
P.O. BOX 217  
BEAR CREEK, WI 54922

Earnings	rate	hours	this period	year to date
Regular	10.3600	40.00	414.40	414.40
<b>Gross Pay</b>			<b>\$414.40</b>	<b>414.40</b>
<b>Deductions</b>				
<b>Statutory</b>				
Federal Income Tax			-37.26	37.26
Social Security Tax			-17.40	17.40
Medicare Tax			-6.01	6.01
WI State Income Tax			-18.86	18.86
<b>Other</b>				
Meals/Housing			-75.00	75.00
<b>Net Pay</b>			<b>\$259.87</b>	

### Important Notes

YOUR COMPANY'S PHONE NUMBER IS 920-560-6458

Your federal taxable wages this period are \$414.40

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TEAR HERE

CO. FILE DEPT. CLOCK NUMBER  
4EI 000106 101552 0014005421 1

005-0002

GREAT LAKES KRAUT CO, LLC  
158 E. NORTHLAND AVE  
APPLETON, WI 54911

Taxable Marital Status: Married  
Exemptions/Allowances:  
Federal: 1  
WI: 1

## Earnings Statement



Period Beginning: 09/12/2011  
Period Ending: 09/18/2011  
Pay Date: 09/22/2011

DIEGO ARMANDO ARROYO GARCIA  
P.O. BOX 217  
BEAR CREEK, WI 54922

Earnings	rate	hours	this period	year to date
Regular	10.3600	49.00	507.64	1,750.84
Overtime	15.5400	11.50	178.71	279.72
<b>Gross Pay</b>			<b>\$686.35</b>	<b>2,030.56</b>

Deductions	Statutory		
Federal Income Tax	-53.14		180.07
Social Security Tax	-28.82		65.26
Medicare Tax	-9.95		29.44
WI State Income Tax	-38.12		101.94
<b>Other</b>			
Meals/Housing	-75.00		300.00
<b>Net Pay</b>		<b>\$481.32</b>	

### Important Notes

YOUR COMPANY'S PHONE NUMBER IS 920-560-6458

Your federal taxable wages this period are \$686.35

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CO. FILE DEPT. CLOCK NUMBER  
4EI 000106 101552 0014031113 1

009-0002

GREAT LAKES KRAUT CO, LLC  
158 E. NORTHLAND AVE  
APPLETON, WI 54911

## Earnings Statement



Period Beginning: 09/19/2011  
Period Ending: 09/25/2011  
Pay Date: 09/29/2011

Taxable Marital Status: Married  
Exemptions/Allowances:  
Federal: 1  
WI: 1

DIEGO ARMANDO ARROYO GARCIA  
P.O. BOX 217  
BEAR CREEK, WI 54922

Earnings	rate	hours	this period	year to date
Regular	10.3600	71.00	735.56	2,486.40
Overtime	15.5400	7.10	110.33	390.05
<b>Gross Pay</b>			<b>\$845.89</b>	<b>2,876.45</b>

### Important Notes

YOUR COMPANY'S PHONE NUMBER IS 920-560-6458

Deductions	Statutory		
	Federal Income Tax	-77.07	257.14
	Social Security Tax	-35.53	120.81
	Medicare Tax	-12.27	41.71
	WI State Income Tax	-50.18	152.12
	<b>Other</b>		
	Meals/Housing	-75.00	375.00
	<b>Net Pay</b>	<b>\$595.84</b>	

Your federal taxable wages this period are \$845.89

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TEAR HERE

Rafael Arroyo Lopez



I am Rafael Arroyo Lopez and I am more than 18 years of age. I am competent to testify about the matters stated herein and, under penalty of perjury of the laws of the United States of America, I swear that the following statements are true and correct:

1. I was born on August 5, 1971. Spanish is my first language. I do not speak or understand English.
2. I went to school through the 11<sup>th</sup> grade.
3. I come from Yuriria, Mexico which is a small city in central Mexico in the state of Guanajuato. That is where I am currently living.
4. Many people in my area are farmers or small business owners, and most families, including mine, do not have very much money.
5. In my town in Mexico, the mail is slow and very unreliable. It is difficult and expensive for me to make international calls or to send international faxes. I know most of the other GLK workers also live in small towns where mail is not reliable, and it is difficult and expensive to make international calls or to send international faxes.
6. I do not understand my legal rights in the United States.
7. I first worked for Great Lakes Kraut or "GLK" in 2011.
8. There were about 100 workers from Mexico at GLK in 2011. The majority of us were trim line operators, which means we cut the stem out of heads of cabbage using drills and knives. A few visa workers from Mexico also helped the cook prepare meals and operated a forklift. The H-2B workers all traveled together from Mexico to Wisconsin. We lived in dormitory buildings very near the GLK plant. We worked together and ate all of our meals together.
9. I do not know the full names and addresses of many of the other visa workers.



## **Expenses for 2011 Employment**

10. I first heard about the job from Elias Vera. I went to Elias Vera's house with my nephew, my cousin, and a friend. Elias told us that he worked for GLK and he was in charge of finding workers.

11. Elias Vera told us that we would work for at least four months, and that GLK would reimburse us for any expenses we had to get to Wisconsin to work.

12. Elias Vera told me that in order to work for GLK in 2011, I had to pay him \$1,200 U.S. dollars, give him a copy of my passport and take a bus with other workers from Santiago Capitiro, Mexico to Matamoros, Mexico to get our work visas. Elias Vera told us that if we did not pay him the money, we would not be able to work at GLK.

13. I paid Elias Vera \$1,200 U.S. dollars in two installments.

14. Elias Vera also told me I had to have a Mexican passport to work for GLK, and to give him a copy. I gave him a copy of my passport to fax to GLK. A copy of passport is attached.

15. Elias Vera arranged for a bus to Matamoros. In early August I took a bus with about 40 other GLK workers from Santiago Capitiro to Matamoros. I knew several of these workers from my town and from nearby towns. I learned from speaking with many of them that we were all going to work for GLK. I paid a friend a \$100 Mexican pesos to drive me from my home to Santiago Capitiro to board the bus, and I paid \$800 Mexican pesos to Elias Vera for this bus. I saw several other GLK workers pay Elias Vera for the bus. The bus took us to a hotel in Matamoros.

16. The owner of the hotel was named Hugo. He greeted us when we got off the bus and explained to all the GLK workers that we had appointments at the American consulate to get our

visas. Hugo also told us that we had to meet with a *licenciado* to help us with our paperwork before going to the consulate.

17. Hugo arranged meetings with the *licenciado*. I believe his name was Jorge but I am not sure.

18. The other workers and I went in groups of four in taxis from the hotel to the *licenciado*'s house where he had his office. Hugo arranged taxis to take us to the *licenciado*'s office, and we each paid \$40 Mexican pesos for the round-trip in the taxis.

19. I paid \$100 Mexican pesos to the *licenciado*. I saw several other workers pay the *licenciado*.

20. Another man named Jorge, who I believe is a lawyer, came to the hotel and met with the workers. He said that he worked for GLK. I believe he was from United States. He helped us with more paperwork. He charged us \$20 U.S. dollars each. I paid him, and I saw several other workers pay him \$20 U.S. dollars. He told us that Elias Vera was not allowed to charge the recruiting fee. Elias was already in Wisconsin at the time.

21. The day after meeting with the man named Jorge, we went in groups of 20 or so to get our visas. Before going to get our visas, we each had to give Hugo \$150 U.S. dollars. After I received my visa, Hugo returned my \$150 U.S. dollars to me. A copy of my visa is attached.

22. Hugo arranged taxis to the consulate, and we each paid \$50 Mexican pesos for the round-trip in the taxis. We went on one day to be interviewed and then the next day a few workers went back to pick up the visas for everyone.

23. After we received our visas and had been at the hotel for a week, Hugo told us that GLK did not want our group of workers in Wisconsin yet and that we had to wait another week.

24. I think almost all of the GLK workers stayed at the hotel because it would have cost us at least \$1600 Mexican pesos and taken several days to go home and then return to Matamoros.
25. We stayed at the hotel for about two weeks. Hugo told us when it was time to go to Wisconsin.
26. I paid the hotel a total of \$3,000 Mexican pesos for the room and meals for 2 weeks. I saw other workers pay Hugo and his assistant.
27. Hugo arranged for taxis to take us to the border. We each paid \$50 Mexican pesos for the taxis to the border.
28. Before entering the United States, all of the workers, including me, had to pay \$6 U.S. dollars as a border entry fee. I saw lots of other workers paying this fee at the border.
29. GLK provided a bus from the American side of the border to Wisconsin. It took about two days to drive to Wisconsin from the border. Although I did not pay for this bus trip, I paid about \$50 U.S. dollars for my food during the two day trip to Wisconsin.
30. We arrived at GLK in Bear Creek on approximately August 22, 2011.
31. We were paid every week at GLK.
32. I spent approximately \$1,276 U.S. dollars and \$4,140 Mexican pesos to work at GLK, including the recruitment fee I paid to Elias; the passport fee; transportation; food and lodging; and the services of the *licenciado* and Jorge. In total, I believe that these expenses amounted to approximately \$1,614 U.S. dollars.
33. I worked 40 hours during my first week of work at GLK in 2011, and was paid approximately \$414.40 gross. A copy of my paycheck for the pay period ending August 28, 2011 is attached. I spent more money to work at GLK than I was paid for my first week of work.
34. I was never reimbursed for any of the money I paid in order to be able to work at GLK.

35. I talked with many of the other workers about how much it cost to get to work at GLK and that we were not reimbursed. No one I talked to said they were reimbursed.

### **Overtime**

36. I do not believe I was properly paid for the overtime I worked during my two last weeks at GLK. For the pay period ending September 18, 2011, I was paid the regular rate for 49 hours of work; for the pay period ending September 25, I was paid the regular rate for 71 hours of work. Copies of these two pay stubs are attached.

37. I talked to several other GLK workers with visas who said they were also paid the regular rate for many overtime hours during their last weeks of work.

### **Termination**

38. When Elias Vera told me about coming to work for GLK, he said that I would work for four months. I expected to work that entire period in order to make enough money to pay for what I spent to get the job and to earn money. I borrowed \$1,200 U.S. dollars to pay the required expenses.

39. In the middle of September, Rafael, a GLK supervisor, posted a list in the kitchen of people to be fired. My name was not on this list. The people on that list were forced to leave the next day.

40. Near the end of September, Rafael posted a list of the rest of the visa workers from Mexico, including me, to be fired.

41. The next day, all of the fired visa workers were told to leave GLK on a bus.

### VERIFICATION

I, Rafael Arroyo López, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury under the laws of the United States of America that the foregoing statements are true and correct.

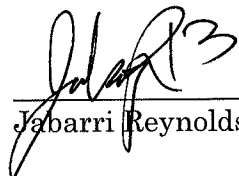
Yo, Rafael Arroyo López, según 28 U.S.C. § 1746, declaro bajo pena de perjurio bajo las leyes de los Estados Unidos de América que las precedentes declaraciones son verdaderas y correctas.

Date/Fecha: 19 Mayo 2012.

X Rafael Arroyo L.  
Rafael Arroyo López

### CERTIFICATION OF COMPREHENSION

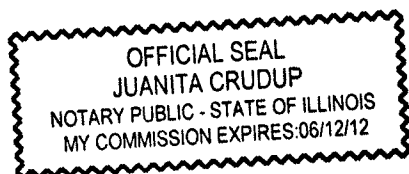
I, Jabbari Reynolds, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury under the laws of the United States of America that I am fluent in the English and Spanish languages and that I read the foregoing Affidavit of Rafael Arroyo Lopez in Spanish to Mr. Arroyo Lopez and that he has confirmed that the Affidavit is true and correct.

  
Jabbari Reynolds

Dated: June 8th, 2012

SUBSCRIBED and SWORN to before me  
this 8th day of June, 2012.

  
Notary Public











# Earnings Statement



007-0002

GREAT LAKES KRAUT CO, LLC  
158 E. NORTHLAND AVE  
APPLETON, WI 54911

Period Beginning: 08/22/2011  
Period Ending: 08/28/2011  
Pay Date: 09/01/2011

Taxable Marital Status: Single  
Exemptions/Allowances:  
Federal: 1  
WI: 1

RAFAEL ARROYO LOPEZ  
P.O. BOX 217  
BEAR CREEK, WI 54922

Earnings	rate	hours	this period	year to date
Regular	10.3600	40.00	414.40	414.40
<b>Gross Pay</b>			<b>\$414.40</b>	414.40

## Important Notes

YOUR COMPANY'S PHONE NUMBER IS 920-560-6458

Deductions	Statutory		
	Federal Income Tax	-37.26	37.26
	Social Security Tax	-17.40	17.40
	Medicare Tax	-6.01	6.01
	WI State Income Tax	-18.86	18.86
	<b>Other</b>		
	Meals/Housing	-75.00	75.00
	<b>Net Pay</b>		<b>\$259.87</b>

Your federal taxable wages this period are \$414.40

CO. FILE DEPT. CLOCK NUMBER  
4Ei 000107 101552 0014005423 1

007-0002

GREAT LAKES KRAUT CO, LLC  
158 E. NORTHLAND AVE  
APPLETON, WI 54911

Taxable Marital Status: Married  
Exemptions/Allowances:  
Federal: 1  
WI: 1

## Earnings Statement



Period Beginning: 09/12/2011  
Period Ending: 09/18/2011  
Pay Date: 09/22/2011

RAFAEL ARROYO LOPEZ  
P.O. BOX 217  
BEAR CREEK, WI 54922

	rate	hours	this period	year to date
<b>Earnings</b>				
Regular	10.3600	49.00	507.64	1,750.84
Overtime	15.5400	11.40	177.16	202.03
<b>Gross Pay</b>			<b>\$684.80</b>	<b>1,952.87</b>
<b>Deductions</b>				
<b>Statutory</b>				
Federal Income Tax			-52.91	168.42
Social Security Tax			-26.76	82.62
Medicare Tax			-9.93	28.32
WI State Income Tax			-37.99	96.29
<b>Other</b>				
Meals/Housing			-75.00	300.00
<b>Net Pay</b>			<b>\$480.21</b>	

Your federal taxable wages this period are \$684.80

### Important Notes

YOUR COMPANY'S PHONE NUMBER IS 920-560-6458

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CO. FILE DEPT. CLOCK NUMBER  
4EI 000107 101552 0014031115 1

011-0002

GREAT LAKES KRAUT CO, LLC  
158 E. NORTHLAND AVE  
APPLETON, WI 54911

Taxable Marital Status: Married  
Exemptions/Allowances:  
Federal: 1  
WI: 1

## Earnings Statement



Period Beginning: 09/19/2011  
Period Ending: 09/25/2011  
Pay Date: 09/29/2011

RAFAEL ARROYO LOPEZ  
P.O. BOX 217  
BEAR CREEK, WI 54922

Earnings	rate	hours	this period	year to date
Regular	10.3600	71.00	735.56	2,486.40
Overtime	15.5400	6.60	102.56	304.59
<b>Gross Pay</b>			<b>\$838.12</b>	<b>2,790.99</b>

### Important Notes

YOUR COMPANY'S PHONE NUMBER IS 920-560-6458

Deductions	Statutory		
	Federal Income Tax	-75.91	244.33
	Social Security Tax	-35.20	117.22
	Medicare Tax	-12.15	40.47
	WI State Income Tax	-49.67	145.96
	<b>Other</b>		
	Meals/Housing	-75.00	375.00
	<b>Net Pay</b>	<b>\$590.19</b>	

Your federal taxable wages this period are \$838.12

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**Alejandro Jurado Jimenez**

I am Alejandro Jurado Jimenez, and I am more than 18 years of age. I am competent to testify about the matters stated herein and, under penalty of perjury of the laws of the United States of America, I swear that the following statements are true and correct:

1. I was born on May 26, 1984. Spanish is my first language. I speak and understand very little English.
2. I went to school through the 9th grade.
3. I come from Santiago Capitiro, Mexico, which is a small town in central Mexico in the state of Guanajuato. That is where I am currently living.
4. Many people in my area are farmers or small business owners, and most families do not have very much money. My father owns a small bakery where I work sometimes.
5. In my town in Mexico, the mail is slow and very unreliable. It is difficult and expensive for me to make international calls or to send international faxes. I know most of the other GLK workers also live in small towns where mail is not reliable, and it is difficult and expensive to make international calls or to send international faxes.
6. I do not understand my legal rights in the United States.
7. I worked at Great Lakes Kraut or "GLK" at the sauerkraut cannery in Bear Creek, Wisconsin in 2006 and 2011. I also worked in Green Bay, Wisconsin, in 2003 at a cucumber plant. I do not remember the name of the company in Green Bay.
8. There were about 100 workers from Mexico at GLK in 2011. The majority of us were trim line operators, which means we cut the stem out of heads of cabbage using drills and knives. A few visa workers from Mexico also helped the cook prepare meals and operated a forklift. The H-2B workers traveled together in groups from Mexico to Wisconsin. We all lived in

dormitory buildings very near the GLK plant. We worked together and ate all of our meals together.

9. I do not know the full names and addresses in Mexico of many of the other GLK visa workers.

### **Expenses for 2011 Employment**

10. In 2011, Elias Vera, a GLK employee, told me that in order to work for GLK, I needed to renew my passport and give him a copy of it, pay a *derecho a visa* fee of \$1,950 Mexican pesos to get a work visa, and take a bus with other workers to Matamoros, Mexico to get our work visas.

11. I renewed my passport, which cost me \$1,750 Mexican pesos, and gave a copy of it to Elias Vera. He told me that he was going to fax my passport to GLK. A copy of my passport is attached.

12. To get a work visa, Elias Vera told me and other GLK workers to go to an internet café in a nearby town, Jaral del Progreso, to pay the *derecho a visa* fee. I went to the café with a group of other workers. We told the woman working at the café that Elias Vera had sent us to pay our *derecho a visa* fees. She gave us a printed piece of paper and told us to take it to a bank nearby. We went to the bank and each paid the bank \$1,950 Mexican pesos. We were not given receipts.

13. We then went to Elias Vera's house and paid him \$800 Mexican pesos for the bus to Matamoros. I actually gave the money to Elias's wife who was helping him to collect the bus fare. All the other workers I was with paid either Elias or his wife \$800 Mexican pesos for the bus.

14. When the other GLK workers and I went to the town square to catch the bus to Matamoros, Elias Vera's wife and his two adult children were there with the list of workers

who could get on the bus. I saw several workers from other towns pay Elias Vera's wife before getting on the bus.

15. There were about 50 people on the bus to Matamoros. I learned from speaking with many of them that we were all going to work for GLK.

16. The bus took us to the Hotel Venezia in Matamoros. While I was working in Wisconsin, I learned, from talking to other GLK workers, that they stayed at the same hotel before coming to Bear Creek.

17. Elias Vera was at the hotel, and he talked to all of the GLK workers as a group. He told us that we had appointments at the American consulate to get our visas, and that we had to meet with a *licenciado* to complete our paperwork before going to the consulate.

18. The other workers and I went in groups of four in taxis from the hotel to the *licenciado*'s office. The hotel owner arranged taxis to take us to the *licenciado*'s office, and we each paid \$30 Mexican pesos for the round-trip in the taxis.

19. I paid \$100 Mexican pesos to the *licenciado*.

20. The day after meeting with the *licenciado*, we went in groups of about 20 to get our visas. The hotel owner arranged taxis to the consulate, and we each paid \$30 Mexican pesos for the round-trip in the taxis. We went on one day to be interviewed and then the next day a few workers went back to pick up the visas for everyone. A copy of my visa is attached.

21. We stayed at the hotel for about five days total, until all 50 workers got their visas and GLK arranged transportation to Wisconsin.

22. I paid the hotel \$1,800 Mexican pesos for lodging and meals. I received a receipt for this payment, which is attached. I saw other workers also pay the hotel owner and his assistant.

23. I also paid the hotel owner \$20 Mexican pesos for setting up all the meetings and taxis.

24. Elias Vera told all of us when it was time to go to Wisconsin. We each paid \$30 Mexican pesos for the taxis to the border.

25. Before entering the United States, all of the workers, including me, had to pay \$6 U.S. dollars as a border entry fee. I saw lots of other workers pay this fee at the border.

26. GLK provided a bus from the American side of the border to Wisconsin. We left the border on about August 5, 2011 and arrived at GLK in Bear Creek, Wisconsin about two days later. Although I did not pay for this bus trip, I paid about \$50 U.S. dollars for my food during the two-day trip to Wisconsin.

27. GLK paid us every week.

28. I spent approximately \$56 U.S. dollars and \$6,510 Mexican pesos to work at GLK, including the *derecho a visa* fee; the passport fee; transportation; and lodging and meals. In total, I believe that these expenses amounted to approximately \$588 U.S. dollars.

29. I worked 26.5 hours during my first week of work at GLK in 2011, and earned \$274.54 gross. A copy of my first paycheck, for the pay period ending August 14, 2011, is attached. I spent more money to be able to work at GLK than I was paid for my first week of work.

30. I was never reimbursed for any of the money I paid in order to be able to work at GLK in 2011.

31. I talked with many of the other workers about how much it cost to get to work at GLK and that we were not reimbursed. No one I talked to said they were reimbursed.

### **Overtime**

32. I am not sure I was properly paid for the overtime I worked during my last week at GLK. I was paid the regular hourly rate for 49 hours that week. A copy of my paycheck for the pay period ending September 18, 2011 is attached.



33. When we received our last paycheck, I talked with several other visa workers who worked the same number of hours and received the same amount of pay as me for the last week of work.

### **Termination**

34. When Elias Vera told me about coming to work for GLK, he said that I would work from August through November. I expected to work that entire period in order to make enough money to make up the money I spent to get to the job and to earn money. In addition to my own money, I borrowed \$400 U.S. dollars to pay the required expenses.

35. On approximately Monday, September 19, 2011, Rafael Jimenez Arroyo, a GLK supervisor, came into the kitchen with a list of people to be fired. My name was on this list.

36. The next day, all of the fired visa workers were told to leave on a bus.

### VERIFICATION

I, Alejandro Jurado Jiménez, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury under the laws of the United States of America that the foregoing statements are true and correct.

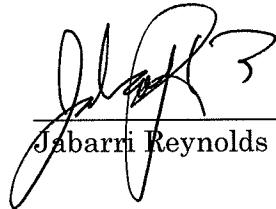
Yo, Alejandro Jurado Jiménez, según 28 U.S.C. § 1746, declaro bajo pena de perjurio bajo las leyes de los Estados Unidos de América que las precedentes declaraciones son verdaderas y correctas.

Date/Fecha: 19-Mayo - 2012

X Alejandro Jurado Jiménez  
Alejandro Jurado Jiménez

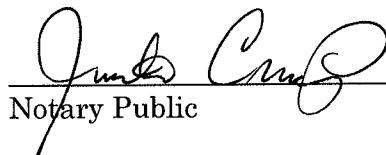
## CERTIFICATION OF COMPREHENSION

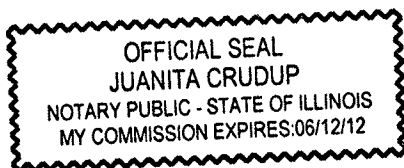
I, Jabbari Reynolds, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury under the laws of the United States of America that I am fluent in the English and Spanish languages and that I read the foregoing Affidavit of Alejandro Jurado Jimenez in Spanish to Mr. Jurado Jimenez and that he has confirmed that the Affidavit is true and correct.

  
\_\_\_\_\_  
Jabbari Reynolds

Dated: June 8<sup>th</sup>, 2012

SUBSCRIBED and SWORN to before me  
this 8<sup>th</sup> day of June, 2012.

  
\_\_\_\_\_  
Notary Public









# NOTA DE REMISION

No.

a 05 de Agosto de 2011

Sr.

Domicilio

Ciudad

Condiciones

Conducto

CANTIDAD

ARTÍCULO

PRECIO

IMPORTE

Hospedaje/  
Alimentos

1800

1<sup>ro</sup> al 5 agosto

PAGADO

DEBEMOS PAGAREMOS INCONDICIONALMENTE SIN PROTESTA A LA ORDEN DE EN ESTA PLAZA EL DÍA DE DE A LA VISTA LA CANTIDAD QUE IMPORTE ESTA REMISION ASI COMO ESTAMOS DE ACUERDO EN QUE ESTE PAGARE CAUSARA INTERESES MORATORIOS A LA RAZON DE SI MENSUAL SOBRE SU IMPORTE (TOTAL O PARCIAL) EN SU CASO MISMO QUE PAGAREMOS SIN EXCUSA NI PRETEXTO ASI COMO LOS GASTOS JUDICIALES Y/O EXTRAJUDICIALES QUE LO ADMITEN LA FIRMA PUESTA EN CUALQUIER LUGAR SE CONSIDERA COMO ACEPTACION DE ESTA FACTURA

SUB-TOTAL

I.V.A.

TOTAL

1800

Recibi

estrella

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017-0002

GREAT LAKES KRAUT CO, LLC  
158 E. NORTHLAND AVE  
APPLETON, WI 54911

## Earnings Statement



Period Beginning: 08/08/2011  
Period Ending: 08/14/2011  
Pay Date: 08/18/2011

Taxable Marital Status: Married  
Exemptions/Allowances:  
Federal: 1  
WI: 1

ALEJANDRO JURADO JIMENEZ  
P.O. BOX 217  
BEAR CREEK, WI 54922

Earnings	rate	hours	this period	year to date
Regular	10.3600	26.50	274.54	274.54
<b>Gross Pay</b>			<b>\$274.54</b>	274.54

### Important Notes

YOUR COMPANY'S PHONE NUMBER IS 920-560-6458

Deductions	Statutory	
Federal Income Tax	-5.15	5.15
Social Security Tax	-11.53	11.53
Medicare Tax	-3.98	3.98
WI State Income Tax	-7.41	7.41
<b>Other</b>		
Meals/Housing	-75.00	75.00
<b>Net Pay</b>		<b>\$171.47</b>

Your federal taxable wages this period are \$274.54

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040-0002

GREAT LAKES KRAUT CO, LLC  
158 E. NORTHLAND AVE  
APPLETON, WI 54911

## Earnings Statement



Period Beginning: 09/12/2011  
Period Ending: 09/18/2011  
Pay Date: 09/22/2011

Taxable Marital Status: Married  
Exemptions/Allowances:  
Federal: 1  
WI: 1

ALEJANDRO JURADO JIMENEZ  
P.O. BOX 217  
BEAR CREEK, WI 54922

Earnings	rate	hours	this period	year to date
Regular	10.3600	49.00	507.64	2,439.78
Overtime	15.5400	12.30	191.14	231.54
<b>Gross Pay</b>			<b>\$698.78</b>	<b>2,671.32</b>

### Important Notes

YOUR COMPANY'S PHONE NUMBER IS 920-560-6458

Deductions	Statutory	
Federal Income Tax	-55.01	140.73
Social Security Tax	-29.35	112.20
Medicare Tax	-10.13	38.73
WI State Income Tax	-39.09	117.88
<b>Other</b>		
Meals/Housing	-75.00	450.00
<b>Net Pay</b>	<b>\$490.20</b>	

Your federal taxable wages this period are \$698.78

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**Jose Jurado Jurado**

I am Jose Jurado Jurado and I am more than 18 years of age. I am competent to testify about the matters stated herein and, under penalty of perjury of the laws of the United States of America, I swear that the following statements are true and correct:

1. I was born on January 20, 1982. Spanish is my first language. I speak and understand very little English.
2. I went to school through the 11th grade.
3. I come from Santiago Capitiro, Mexico which is a small town in central Mexico in the state of Guanajuato. That is where I am currently living.
4. Many people in my area are farmers or small business owners, and most families, including mine, do not have very much money.
5. In my town in Mexico, the mail is slow and very unreliable. It is difficult and expensive for me to make international calls or to send international faxes. I know most of the other GLK workers also live in small towns where mail is not reliable, and it is difficult and expensive to make international calls or to send international faxes.
6. I do not understand my legal rights in the United States.
7. I first went to work for Great Lakes Kraut, or "GLK," in 2002. I have worked at GLK six times, including in both 2010 and 2011. I first heard about the job in 2002 from Rafael Jimenez Arroyo, who works for GLK. It used to be that only Rafael recruited workers. A few years ago, Elias Vera, who also works for GLK, got involved in recruiting workers.
8. There were about 100 workers from Mexico at GLK in both 2010 and 2011. The majority of us were trim line operators, which means we cut the stem out of heads of cabbage using drills and knives. A few visa workers from Mexico also helped the cook prepare meals and operated a forklift. The H-2B workers traveled together in groups from Mexico to Wisconsin. We all lived

in dormitory buildings very near the GLK plant. We worked together and ate all of our meals together.

9. I do not know the full names and addresses in Mexico of many of the other visa workers.

#### **Expenses for 2010 Employment**

10. In 2010, Elias Vera told me that to work for GLK that year I needed to give him a copy of a current passport; pay a *derecho a visa* fee of \$1,950 Mexican pesos for a work visa; and travel with other GLK workers to the American consulate in Mexico City to get our work visas.

11. Following Elias's instructions, I brought him a copy of my passport. He told me he had to fax it to GLK. A copy of this passport is attached.

12. Prior to going to Mexico City to get my work visa, I went to a Banamex in Jaral del Progreso and paid \$1,950 Mexican pesos for the *derecho a visa* fee. As I understood it, this payment was required for me to get a work visa.

13. I then paid Elias Vera about \$600 Mexican pesos for a bus from Santiago Capitiro to Mexico City. I saw several other workers pay Elias for the bus just before boarding the bus.

14. There were about 50 people on the bus from Santiago Capitiro to Mexico City. We were all going to work for GLK. I knew several of these workers from my town and from nearby towns, and from the years I had worked at GLK in the past. There were other people on the bus from other towns that I did not know. Elias Vera rode the bus with us.

15. The bus took us to a hotel in Mexico City. I do not remember the name of the hotel. I later learned from talking to other GLK workers that all of the workers who came through Mexico City to work at GLK stayed at the same hotel as I did, although we were not all there at the same time.

16. A person named Jorge talked to all of the GLK workers at the hotel. We were told by Elias Vera that Jorge was a *licenciado*. Jorge told all of us that we had appointments at the American consulate to get our visas, and that we had to meet with *secretarias* to complete our paperwork before going to the consulate.

17. Jorge arranged our meetings with the *secretarias*. The other workers and I went in groups the *secretarias*' office. The *secretarias* took our photographs and our fingerprints

18. I paid \$50 U.S. dollars to the *secretarias*. I saw other workers also pay \$50.

19. We stayed at the hotel in Mexico City for about two or three days until all the GLK workers got their visas. A copy of my visa is attached.

20. I paid the hotel in Mexico City \$1,200 Mexican pesos for lodging. I saw other workers paying for the hotel. I also spent approximately \$300 Mexican pesos on food during my stay in Mexico City.

21. Everardo Hurtado Ruiz, who was a worker for GLK and was in Mexico City with us, told us when it was time to board the bus for Matamoros, Mexico so that we could cross the border. Everardo collected the money for the bus. I paid approximately \$350 Mexican pesos for the bus from Mexico City to Matamoros. I saw other workers pay Everardo for the bus. All of the passengers on the bus were GLK workers.

22. The bus took us to a hotel in Matamoros. We stayed there for one night while we waited for GLK to arrange for our transportation from Matamoros to Wisconsin. I believe that all of the GLK workers stayed in the same hotel as I did, although we were not all there at the same time.

23. I paid the hotel manager in Matamoros \$300 Mexican pesos for lodging and meals there. I saw other workers pay the hotel manager.

24. On approximately August 13, 2010, Everardo told us it was time to go to Wisconsin. The hotel manager arranged for taxis to take us to the border. We each paid \$30 Mexican pesos for the taxis to the border.

25. Before entering the United States, all of the workers, including me, had to pay \$6 U.S. dollars as a border entry fee. I saw many of the other workers paying this fee at the border.

26. After crossing the border, we boarded a bus that took us to Bear Creek, Wisconsin. I was not required to pay the bus fare for this part of the trip.

27. It took about two days to drive from the border to Wisconsin. The workers all had to pay for our own food during this trip; I myself spent about \$60 U.S. dollars for my food.

28. Altogether, I spent approximately \$116 U.S. dollars and \$4,730 Mexican pesos in order to work at GLK, including the money that I paid for the *derecho a visa*; transportation; lodging and meals. In total, I believe that these expenses amounted to approximately \$486 U.S. dollars.

29. GLK paid us every week.

30. My paystub for the period ending August 22, 2010 shows that I worked 39.4 hours and was paid \$309.29 gross during my first week of work at GLK in 2010. In that first paycheck, I was not reimbursed for any of the money that I spent in order to work for GLK. A copy of my first paystub is attached. I spent more money to be able to work at GLK than I was paid for my first week of work.

31. In my second paycheck in 2010, I was paid an extra approximately \$121 in addition to my wages for hours worked. I was not told why this extra amount was included in that paycheck but we thought it was to reimburse our expenses. Still, this extra amount did not cover all of the money I had paid in order to work at GLK. A copy of this paystub is attached.

32. I talked with many of the other workers about how much it cost to get to work at GLK and that we were not reimbursed except for approximately \$121 after the second week of work. No one I talked to said he was reimbursed any other amount, or he was reimbursed earlier.

33. When Elias Vera told me about coming to work for GLK, he said I would work from August through November. I expected to work that entire period in order to make enough money to pay for what I spent to get the job and to earn money. In addition to my own money, I borrowed \$5,000 Mexican pesos and paid \$1,000 Mexican pesos in interest to a house of lending to cover the required expenses.

34. Instead of offering work until November, GLK told us in late September or early October that there was no work. After being told this, I left along with the other visa workers.

#### **Expenses for 2011 Employment**

35. In 2011, following Rafael Jimenez Arroyo's instructions, I renewed my passport. This cost me \$1800 Mexican pesos. I gave Elias Vera a copy of my passport because he told me that he needed to fax it to GLK. A copy of my passport is attached.

36. I went to a café with internet access to get a form I needed to work at GLK. I took that form to a Banamex in Jaral del Progreso. I paid \$1,950 Mexican pesos to the bank for a *derecho a visa*.

37. Following Rafael Jimenez Arroyo's instructions, I took a bus with other workers from Santiago Capitiro to Matamoros, Mexico in late July. I paid \$800 Mexican pesos to Elias Vera's wife for the bus. I saw several other workers pay her for the bus.

38. There were about 50 people on the bus from Santiago Capitiro to Matamoros. I learned from speaking with other workers on the bus that we were all going to work for GLK. I know

several of these workers from my town and from nearby towns, and from previous years I worked at GLK.

39. The bus took us to the Hotel Venezia in Matamoros. I believe that all of the GLK workers stayed at this hotel based on conversations I had with workers in Bear Creek Wisconsin.

40. Elias Vera and a man who said he was the owner of the hotel talked to all of the GLK workers at the hotel. I do not remember the name of the owner of the hotel. Elias Vera told all of us that we had appointments at the American consulate to get our visas, and that we had to meet with a *licenciado* to complete our paperwork before going to the consulate.

41. The other workers and I went in groups of four in taxis from the hotel to the *licenciado*'s house where he had his office. We each paid \$40 Mexican pesos for the round trip in the taxis.

42. I paid \$100 Mexican pesos to the *licenciado*. I saw other workers pay the *licenciado*.

43. The day after meeting with the *licenciado*, we went in groups of about 20 to get our visas. The hotel owner arranged taxis to the consulate, and we each paid \$40 Mexican pesos for the round trip in the taxis. We all went on one day to be interviewed, and then the next day a few workers went back to pick up the visas for everyone. A copy of my 2011 visa is attached.

44. We stayed at the hotel in Matamoros for about five days, until all the GLK workers at the hotel got their visas and GLK arranged for transportation to Wisconsin.

45. I paid the hotel \$1,800 Mexican pesos for lodging and meals. A copy of hotel receipt is attached. I also paid the hotel manager \$20 U.S. dollars for paperwork he had done.

46. I saw other workers paying the hotel manager or his assistant.

47. After we all received visas on about August 5, 2011, the hotel manager arranged for taxis to take us to the border. We each paid \$20 Mexican pesos for the taxis to the border.

48. Before entering the United States, all of the workers, including me, had to pay \$6 U.S. dollars as a border entry fee. I saw many of the other workers paying this fee at the border.

49. From the border, we traveled by bus to Wisconsin. It took about two days to drive from the border to Wisconsin. Although I did not pay for this bus trip, I paid about \$60 U.S. dollars for my food during the trip.

50. GLK paid us every week.

51. In 2011, I spent approximately \$86 U.S. dollars and \$6,550 Mexican pesos in order to work for GLK, including the *derecho a visa* fee; the passport fee; transportation; lodging and meals. In total, I believe that these expenses amounted to approximately \$622 U.S. dollars.

52. I worked 26.80 hours during my first week of work at GLK in 2011, and was paid \$277.65 gross. A copy of my first pay check, for the pay period ending August 14, 2011, is attached. I spent more money to work at GLK than I was paid for my first week of work.

53. I was never reimbursed for any of the money I paid in order to be able to work at GLK in 2011.

### **Overtime**

54. I do not believe I was properly paid for the overtime I worked during my last week at GLK. I was paid the regular rate for at least 9 overtime hours worked. A copy of my last paycheck, for the pay period ending September 18, 2011, is attached.

55. I talked with several other visa workers, and they said they were also paid the regular rate for overtime hours worked in the last week.

### **Termination**

56. In 2011, when Rafael told me about coming to work for GLK, he said that I would work from August through November. I expected to work that entire period in order to make enough



money to pay for what I spent to get the job and to earn money. In addition to my own money, I borrowed \$10,000 Mexican pesos at 10% interest to pay the required expenses.

57. On approximately Monday, September 19, 2011, Rafael came into the kitchen with a list of people to be fired. My name was on this list.

58. The next day, Gina from GLK told all of the fired workers to leave GLK on a bus.

### VERIFICATION

I, José Jurado Jurado, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury under the laws of the United States of America that the foregoing statements are true and correct.


Yo, José Jurado Jurado, según 28 U.S.C. § 1746, declaro bajo pena de perjurio bajo las leyes de los Estados Unidos de América que las precedentes declaraciones son verdaderas y correctas.

Date/Fecha: 19-Mayo 2012.

X José Jurado Jurado  
José Jurado Jurado

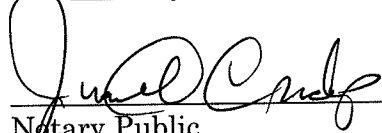
### CERTIFICATION OF COMPREHENSION

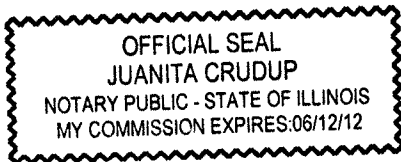
I, Jabarri Reynolds, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury under the laws of the United States of America that I am fluent in the English and Spanish languages and that I read the foregoing Affidavit of Jose Jurado Jurado in Spanish to Mr. Jurado Jurado and that he has confirmed that the Affidavit is true and correct.

  
Jabarri Reynolds

Dated: June 8<sup>th</sup>, 2012

SUBSCRIBED and SWORN to before me  
this 8<sup>th</sup> day of June, 2012.

  
Notary Public



Le Ministère des Affaires Étrangères des États-Unis du Mexique, crée les autorités compétentes de bien vouloir laisser passer librement et sans entrave le titulaire du présent passeport, de nationalité mexicaine, et de lui prêter toute aide et assistance possibles.



CO. FILE DEPT. CLOCK NUMBER  
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036-0002

GREAT LAKES KRAUT CO., LLC  
11 CLARK STREET  
SHORTSVILLE, NY 14548

## Earnings Statement



Period Ending: 08/22/2010  
Pay Date: 08/26/2010

Taxable Marital Status: Married  
Exemptions/Allowances:  
Federal: 3  
WI: 3

JOSE JURADO JURADO  
421 TELLOCK  
BEAR CREEK, WI 54922

Earnings	rate	hours	this period	year to date
Regular	7.8500	39.40	309.29	309.29
<b>Gross Pay</b>			<b>\$309.29</b>	309.29

Deductions	Statutory	
Social Security Tax	-19.18	19.18
Medicare Tax	-4.48	4.48
WI State income Tax	-8.50	8.50
<b>Other</b>		
Meals/Housing	-64.29	64.29
<b>Net Pay</b>	<b>\$212.84</b>	

Your federal taxable wages this period are \$309.29

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## Earnings Statement



037-0002

GREAT LAKES KRAUT CO., LLC  
11 CLARK STREET  
SHORTSVILLE, NY 14548

Period Ending: 08/29/2010  
Pay Date: 09/02/2010

Taxable Marital Status: Married  
Exemptions/Allowances:  
Federal: 3  
WI: 3

JOSE JURADO JURADO  
421 TELLOCK  
BEAR CREEK, WI 54922

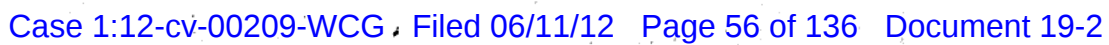
Earnings	rate	hours	this period	year to date
Regular	7.8500	35.70	280.25	589.54
<b>Gross Pay</b>			<b>\$280.25</b>	589.54
<b>Deductions</b>				
<b>Statutory</b>				
Social Security Tax			-17.37	36.55
Medicare Tax			-4.07	8.55
WI State Income Tax			-6.96	15.46
<b>Other</b>				
Meals/Housing			-75.00	139.29
Reimbursement				-121.00
<b>Adjustment</b>				
Reimbursement			+121.00	
<b>Net Pay</b>			<b>\$297.85</b>	

Your federal taxable wages this period are \$280.25

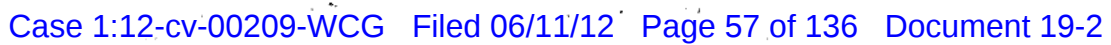
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# NOTA DE REMISIÓN

No.

a 05 de Agosto de 2011

Sr. Jose Jurado Jurado

Domicilio

Ciudad

Condiciones Conducto

CANTIDAD	ARTÍCULO	PRECIO	IMPORTE
	Hospedaje/		1800
	Alimentos		
	1ro al 5 agosto		
	<b>PAGADO</b>		

DEREBEMOS Y PAGAREMOS INCONDICIONALMENTE Y SIN PROTESTA A LA ORDEN DE EN ESTA PLAZA EL DIA DE DE A LA VISTA LA CANTIDAD QUE IMPORTE ESTA REMISIÓN, ASI COMO ESTAMOS DE ACUERDO EN QUE ESTE PAGARE CAUSARÁ INTERESES MORATORIOS A LA RAZÓN DE 1% MENSUAL SOBRE SU IMPORTE (TOTAL O PARCIAL) EN SU CASO, MISMO QUE PAGAREMOS SIN EXCUSA HIPOTÉCTICA, ASI COMO LOS GASTOS JUDICIALES Y/O EXTRAJUDICIALES QUE LO ADMITEN, LA FIRMA PUESTA EN CUALQUIER LUGAR SE CONSIDERA COMO ACEPTACIÓN DE ESTA FACTURA.

SUB-TOTAL

I.V.A.

TOTAL

Recibi

estrella

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019-0002

GREAT LAKES KRAUT CO, LLC  
158 E. NORTHLAND AVE  
APPLETON, WI 54911

## Earnings Statement



Period Beginning: 08/08/2011  
Period Ending: 08/14/2011  
Pay Date: 08/18/2011

Taxable Marital Status: Married  
Exemptions/Allowances:  
Federal: 1  
WI: 1

JOSE JURADO JURADO  
421 TELLOCK  
BEAR CREEK, WI 54922

Earnings	rate	hours	this period	year to date
Regular	10.3600	26.80	277.65	277.65
<b>Gross Pay</b>			<b>\$277.65</b>	<b>277.65</b>

### Important Notes

YOUR COMPANY'S PHONE NUMBER IS 920-560-6458

Deductions	Statutory		
Federal Income Tax	-5.46	5.46	
Social Security Tax	-11.66	11.66	
Medicare Tax	-4.03	4.03	
WI State Income Tax	-7.55	7.55	
<b>Other</b>			
Meals/Housing	-75.00	75.00	
<b>Net Pay</b>			<b>\$173.95</b>

Your federal taxable wages this period are \$277.65

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042-0002

GREAT LAKES KRAUT CO, LLC  
158 E. NORTHLAND AVE  
APPLETON, WI 54911

## Earnings Statement



Period Beginning: 09/12/2011  
Period Ending: 09/18/2011  
Pay Date: 09/22/2011

Taxable Marital Status: Married  
Exemptions/Allowances:  
Federal: 1  
WI: 1

JOSE JURADO JURADO  
421 TELLOCK  
BEAR CREEK, WI 54922

Earnings	rate	hours	this period	year to date
Regular	10.3600	49.00	507.64	2,442.89
Overtime	15.5400	12.00	186.48	228.43
<b>Gross Pay</b>			<b>\$694.12</b>	<b>2,671.32</b>

### Important Notes

YOUR COMPANY'S PHONE NUMBER IS 920-560-6458

Deductions	Statutory	
Federal Income Tax	-54.31	140.50
Social Security Tax	-29.16	112.20
Medicare Tax	-10.06	38.73
WI State Income Tax	-38.72	117.76
<b>Other</b>		
Meals/Housing	-75.00	450.00
<b>Net Pay</b>	<b>\$486.87</b>	

Your federal taxable wages this period are \$694.12

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**Carlos Jurado Rangel**

I am Carlos Jurado Rangel and I am more than 18 years of age. I am competent to testify about the matters stated herein and, under penalty of perjury of the laws of the United States of America, I swear that the following statements are true and correct:

1. I was born on June 14, 1976. Spanish is my first language. I do not speak or understand English.
2. I went to school through the junior year of high school.
3. I come from Santiago Capitiro, Mexico, which is a small town in central Mexico in the state of Guanajuato. That is where I am currently living.
4. Many people in my area are farmers, and most families do not have very much money, including mine.
5. In my town in Mexico, the mail is slow and very unreliable. It is difficult and expensive for me to make international calls or to send international faxes. I know most of the other GLK workers also live in small towns where mail is not reliable, and it is difficult and expensive to make international calls or to send international faxes.
6. I do not understand my legal rights in the United States.
7. I worked at Great Lakes Kraut, or "GLK," at the sauerkraut cannery in Bear Creek, Wisconsin in several years, including 2010 and 2011.
8. There were about 100 workers from Mexico at GLK in both 2010 and 2011. The majority of us were trim line operators, which means we cut the stem out of heads of cabbage using drills and knives. A few visa workers from Mexico also helped the cook prepare meals and operated a forklift. The H-2B workers traveled together in groups from Mexico to Wisconsin. We all lived in dormitory buildings very near the GLK plant. We worked together and ate all of our meals together.

9. I do not know the full names and addresses in Mexico of many of the other visa workers.

### **Expenses for 2010 Employment**

10. In 2010, Elias Vera, who works for GLK, told me that to work for GLK that year I needed to pay a *derecho a visa* fee to get a work visa, give him a copy of my current passport, and take a bus with other workers to an American consulate in Mexico City to get our work visas.

11. Following Elias Vera's instructions, I brought him a copy of my passport. I believe he told me he would fax it to the U.S. Consulate, but I am not certain. He may have told me it was going to be faxed to GLK.

12. Prior to going to Mexico City to get my work visa, I went to an internet café to complete an application for a visa. I took this application to Mexico City with me. I believe I paid \$20-\$30 pesos for this application. I also went to a Banamex in Jaral del Progreso and paid \$1,950 Mexican pesos for the *derecho a visa* fee. As I understood it, I was required to make this payment to get a work visa so that I could work for GLK.

13. When it was time to go to Mexico City, I paid the bus driver about \$300 Mexican pesos for a bus from Santiago Capitiro to Mexico City. Elias Vera arranged for the bus. I saw several other workers pay the bus driver just before boarding.

14. There were about 40-50 people on the bus from Santiago Capitiro to Mexico City. I found out from talking to several people that we were all going to work for GLK. I knew several of these workers from my town and from nearby towns. There were other people on the bus who I did not know.



15. The bus took us to a hotel in Mexico City. I do not remember the name of the hotel. I later learned, from talking to other GLK workers that all of the workers who came through Mexico City to work at GLK stayed in the same hotel.

16. A person named Jorge talked to all of the GLK workers at the hotel. We were told by Elias Vera that Jorge was a lawyer. Jorge told us that we had appointments at the American consulate to get our visas, and that we had to complete paperwork before going to the consulate.

17. Some of the other workers and I walked from the hotel to Jorge's office. His secretary helped us complete our paperwork including finger prints.

18. I paid \$50 U.S. dollars to the Jorge for his services. I saw others workers pay him this same amount.

19. We stayed at the hotel in Mexico for approximately 3 days until all the GLK workers at the hotel got their visas. A copy of my visa is attached.

20. I paid the hotel in Mexico City about \$300 Mexican pesos for the lodging. I saw other workers paying the hotel manager. I also paid about \$300 Mexican pesos for food for the 3 days in Mexico City.

21. Jorge told us we had to take a bus from Mexico City to Matamoros, Mexico to cross the border into the U.S. I paid \$600 Mexican pesos for the bus from Mexico City to Matamoros and one night in the hotel in Matamoros. I believe I paid this to Jorge.

22. The bus took us to the Hotel Venezia in Matamoros. We stayed there for one night while we waited for GLK to arrange for our transportation from Matamoros to Wisconsin. I believe that all of the GLK workers stayed in the same hotel in Matamoros.

23. Before entering the United States, all of the workers, including me, paid \$6.00 U.S. dollars as a border entry fee. I saw many other workers pay this fee at the border.



24. I recall the bus picking us up at the hotel and driving us across the border. I did not have to pay for this bus. I do not believe any worker paid for this bus.

25. It took about two to three days to drive from the border to Wisconsin. We all had to pay for our own food during the trip; I myself spent about \$50 U.S. dollars for my food.

26. Altogether, I spent approximately \$106 U.S. dollars and \$3,470 Mexican pesos in order to work at GLK in 2010, including the *derecho a visa* fee; transportation; and lodging and meals. In total, I believe that these expenses amounted to approximately \$378 U.S. dollars.

27. When we arrived at GLK, other workers told us the cabbage was rotten and there was very little work. We did not work for GLK for the first 1 or 2 weeks we were in Wisconsin. I was not paid anything during this time.

28. Once we started working, GLK paid us every week.

29. My paystub for the period ending August 22, 2010 shows that I worked 39.4 hours and was paid \$309.29 gross during my first week of work at GLK in 2010. A copy of my first paystub is attached. In that first paycheck, I was not reimbursed for any of the money that I spent in order to work for GLK. I spent more money to be able to work at GLK than I was paid for my first week of work.

30. My paystub for the period ending August 29, 2010 shows that I was paid an extra \$121.00 in addition to my wages. A copy of this paystub is attached. I was not told why this extra amount was included in that paycheck. This extra amount did not cover the cost of my visa, let alone all of the money I had paid in order to work at GLK.

31. I talked with many of the other workers about how much it cost to get to work at GLK and that we were not reimbursed except for the approximately \$121.00 after the second week of work. No one I talked to said they were reimbursed any other amount, or reimbursed earlier.

32. When Elias told me about coming to work for GLK in 2010, he said that I would work for two – three months of work. I expected to work that entire period in order to make enough money to pay for what I spent to get the job and to earn money. In addition to my own money, I borrowed about \$5,000 Mexican pesos from family to pay the required expenses.

33. Instead of offering work until November, GLK told us in late September or early October that there was no work. After being told this, I left along with the other visa workers.

### **Expenses for 2011 Employment**

34. In 2011, Elias Vera told me what I had to do to work for GLK that year.

35. First, Elias Vera told me and other workers to go to an internet café in Jaral del Progreso, a town nearby, to pay the *derecho a visa* fee. I went to the internet café with a group of other workers. The woman filled out some information on the computer and gave each of us a printed piece of paper and told us to take it to a bank nearby. A copy of the paper she gave me is attached. I paid the woman \$6 Mexican pesos for this transaction.

36. I took the paper that I received from the internet café to Banamex and paid \$1,820 Mexican pesos for the *derecho a visa*. I was given a small receipt from the bank, which Elias later collected from me at the hotel in Matamoros.

37. I paid \$25 Mexican pesos for the bus to and from Jaral del Progreso to make the *derecho a visa* payment.

38. I also renewed my passport in order to work at GLK in 2011. This cost me \$1,500 Mexican pesos. Following Elias Vera's instructions, I gave him a copy of my passport. I believe he faxed it to the American consulate or to GLK. Elias charged me \$35 Mexican pesos for sending the fax. A copy of my passport is attached.

39. A few days before several other GLK workers and I were leaving for Matamoros, Mexico, I went with a group of other GLK workers to Elias Vera's house and paid him \$300 Mexican pesos for the bus to Matamoros. Then when we got on the bus, we paid the bus driver \$500 Mexican pesos. I saw several other workers pay Elias Vera and the bus driver as well.

40. There were about 40 people on the bus with me plus a van with about 12-13 people also going to Matamoros. I learned from speaking with other workers on the bus that we were all going to work for GLK. I knew several of these workers from my town and from nearby towns, and from previous years I worked at GLK.

41. The bus took us to the Hotel Venezia in Matamoros. I later learned that all of the GLK workers stayed in the same hotel before coming to Bear Creek.

42. Elias Vera, the hotel owner or manager named Hugo, and Hugo's assistant were in charge of the GLK workers at the hotel. Elias Vera told us that we had appointments at the American consulate to get our visas, and that we had to meet with a *licenciado* to complete our paperwork before going to the consulate.

43. Elias Vera and the hotel owner arranged the meetings with the *licenciado*.

44. The other workers and I went in groups of four in taxis from the hotel to the *licenciado*'s house where he had his office. We each paid \$30 Mexican pesos for the round-trip in the taxis.

45. I paid \$100 Mexican pesos to the *licenciado* for his help with the paperwork. I believe this money also paid for fingerprints and photographs. When I showed the *licenciado* the Banamex deposit slip for \$1,820, he explained that I had mistakenly purchased a tourist visa as opposed to a work visa. I should have paid \$1,950 Mexican pesos. The *licenciado* took care of this problem, and I was never required to pay the balance.

46. The day after meeting with the *licenciado*, we went in groups of about 20 to get our visas. Hugo arranged taxis to the consulate, and we each paid \$30 Mexican pesos for the round-trip in the taxis. We went on one day to be interviewed and then the next day a few workers went back to pick up the visas for everyone. A copy of my visa is attached.

47. We stayed at the hotel for about five days, until all the workers got their visas and GLK arranged transportation to Wisconsin.

48. I paid the hotel \$1,800 Mexican pesos for lodging and meals there. A copy of my receipt is attached. I saw other workers also pay the hotel owner and his assistant.

49. Before I left the hotel, I paid Hugo another \$20 U.S. dollars that he said was for the *licenciado*.

50. Elias Vera told all of us when it was time to go to Wisconsin.

51. Hugo arranged for taxis to take us to the border. We each paid \$30 Mexican pesos for the taxis to the border.

52. Before entering the United States, all of the workers, including me, had to pay \$6 U.S. dollars as a border entry fee. I saw lots of other workers pay this fee at the border.

53. GLK provided a bus from the American side of the border to Wisconsin. We left the border on about August 5, 2011 and arrived at GLK in Bear Creek, Wisconsin about two days later. Although I did not pay for this bus trip, I paid about \$50 U.S. dollars for my food during the two-day trip to Wisconsin.

54. GLK paid us every week.

55. I spent approximately \$76 U.S. dollars and \$6,176 Mexican pesos in order to work at GLK, including the *derecho a visa* fee; the passport fee; transportation; lodging and meals; and

the border entry fee. In total, I believe that these expenses amounted to approximately \$581 U.S. dollars.

56. I worked 26.5 hours during my first week of work at GLK in 2011, and was paid \$274.54 gross. A copy of my first pay check, for the pay period ending August 14, 2011, is attached. I spent more money to be able to work at GLK than I was paid for my first week of work.

57. I was never reimbursed for any of the money I paid in order to be able to work at GLK in 2011.

58. I talked with many of the other workers about how much it cost to get to work at GLK and that we were not reimbursed. No one I talked to said they were reimbursed.

#### **Overtime and Off-the-Clock Time**

59. I am not sure I was properly paid for the overtime I worked during my last week at GLK. A copy of my September 18, 2011, paystub shows that I was paid the regular rate of pay for 49 hours of work. The paystub is attached.

60. I also do not believe I was paid for all the hours I worked. We were told on Monday, September 19 that we were fired. I worked 8 hours that day. The next day, we received our final paycheck for the work the week before and left GLK. I do not believe that I was paid for the 8 hours I worked on the Monday when I was fired.

#### **Termination**

61. When Elias told me about coming to work for GLK in 2011, he said that I would work for at least three months. I expected to work that entire period in order to make enough money to pay for what I spent to get the job. In addition, when we left early in 2010, the owner of GLK, Ryan Downs, told us that 2011 would be a better year. Rafael interpreted for him when he said

this. In addition to my own money, I borrowed about \$6,000 Mexican pesos from family to work for GLK in 2011.

62. On approximately Monday, September 19, 2011, Rafael came into the kitchen with a list of people to be fired. My name was on this list.

63. The next day, all of the fired visa workers were told to leave on a bus to Laredo, Texas.

### VERIFICATION

I, Carlos Jurado Rangel, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury under the laws of the United States of America that the foregoing statements are true and correct.

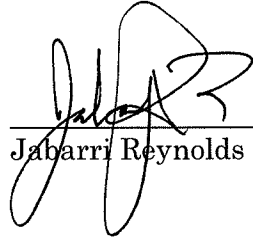
Yo, Carlos Jurado Rangel, según 28 U.S.C. § 1746, declaro bajo pena de perjurio bajo las leyes de los Estados Unidos de América que las precedentes declaraciones son verdaderas y correctas.

Date/Fecha: 19 Mayo

X Carlos Jurado Rangel  
Carlos Jurado Rangel


### CERTIFICATION OF COMPREHENSION

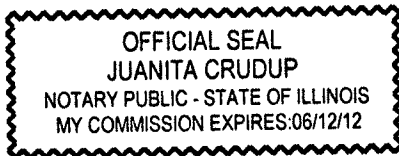
I, Jabbari Reynolds, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury under the laws of the United States of America that I am fluent in the English and Spanish languages and that I read the foregoing Affidavit of Carlos Jurado Rangel in Spanish to Mr. Jurado Rangel and that he has confirmed that the Affidavit is true and correct.

  
\_\_\_\_\_  
Jabbari Reynolds

Dated: June 8<sup>th</sup>, 2012

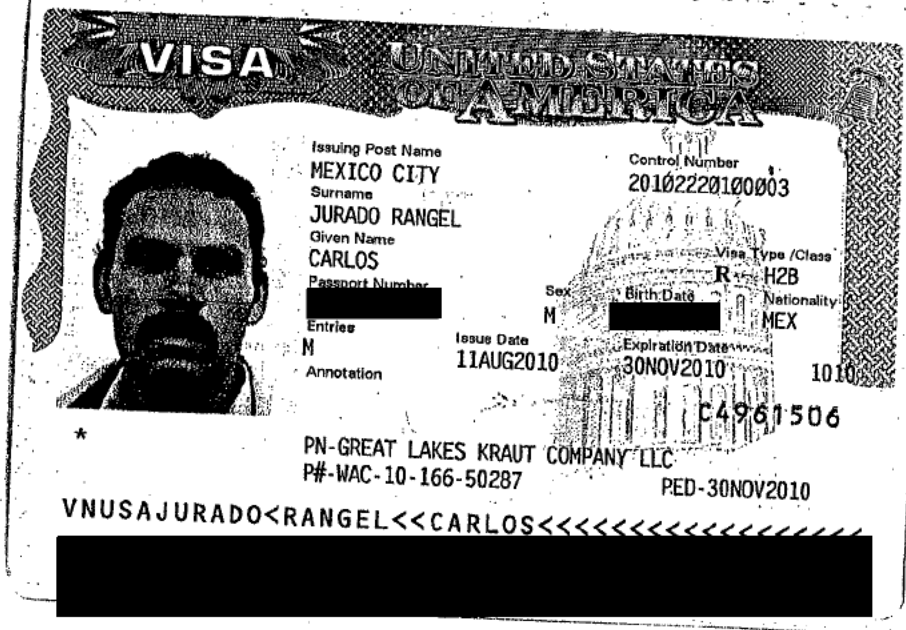
SUBSCRIBED and SWORN to before me  
this 8<sup>th</sup> day of June, 2012.

  
\_\_\_\_\_  
Notary Public





THE



CO. FILE DEPT. CLOCK NUMBER  
IB9 002662 506055 0012584872 1

## Earnings Statement



040-0002

GREAT LAKES KRAUT CO., LLC  
11 CLARK STREET  
SHORTSVILLE, NY 14548

Period Ending: 08/22/2010  
Pay Date: 08/26/2010

Taxable Marital Status: Married  
Exemptions/Allowances:  
Federal: 6  
WI: 6

CARLOS JURADO RANGEL  
421 TELLOCK  
BEAR CREEK, WI 54922

Earnings	rate	hours	this period	year to date
Regular	7.8500	39.40	309.29	309.29
<b>Gross Pay</b>			<b>\$309.29</b>	309.29
<b>Deductions</b>				
<b>Statutory</b>				
Social Security Tax			-19.18	19.18
Medicare Tax			-4.48	4.48
WI State Income Tax			-7.44	7.44
<b>Other</b>				
Meals/Housing			-64.29	64.29
<b>Net Pay</b>			<b>\$213.90</b>	

Your federal taxable wages this period are \$309.29

COPY

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CO. FILE DEPT. CLOCK NUMBER  
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## Earnings Statement



041-0002

GREAT LAKES KRAUT CO., LLC  
11 CLARK STREET  
SHORTSVILLE, NY 14548

Period Ending: 08/29/2010  
Pay Date: 09/02/2010

Taxable Marital Status: Married  
Exemptions/Allowances:  
Federal: 6  
WI: 6

CARLOS JURADO RANGEL  
421 TELLOCK  
BEAR CREEK, WI 54922

Earnings	rate	hours	this period	year to date
Regular	7.8500	35.70	280.25	589.54
<b>Gross Pay</b>			<b>\$280.25</b>	589.54
<b>Deductions</b>				
<b>Statutory</b>				
Social Security Tax			-17.37	36.55
Medicare Tax			-4.07	8.55
WI State Income Tax			-5.90	13.34
<b>Other</b>				
Meals/Housing			-75.00	139.29
Reimbursement				-121.00
<b>Adjustment</b>				
Reimbursement			+121.00	
<b>Net Pay</b>			<b>\$298.91</b>	

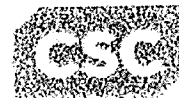
Your federal taxable wages this period are \$280.25

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**Ficha de Depósito CSC Servicios Consular EE.UU. MRV**

Número de Recibo (MRV): 1905100477 (Referencia Única)



Cantidad por Cargo: \$Pesos 1820.00

Número de Cargos: 1

**Cantidad Total del Depósito: \$Pesos 1820.00**

Fecha de Vencimiento de la Ficha de Depósito: 0722. 09. 07

Convenio 1545

CSC Consular Services

Realice su depósito en  
cualquier sucursal  
Solo efectivo

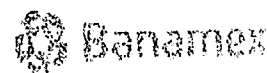


Suc. Cuenta: 023 - 3047007

Referencia Alfanumerica FE31221937SOLUF2931

CSC Consular Services

Realice su depósito en  
cualquier sucursal  
Solo efectivo



**Cómo pagar la cuota de Solicitud de Visa (MRV)**

1. No compartalas fichas de depósito. La cuota de la Solicitud de Visa es determinada por el tipo de visa que usted está solicitando. Verifique que la "Cantidad Total del Depósito" contiene la cantidad correcta.
2. El número de recibo debe ser único para validar el pago. Cada solicitante debe descargar una ficha de depósito única.
3. Imprima una copia de la ficha de depósito.
4. Guarde el recibo de pago que el cajero del banco le proporciona.
5. Una vez que haya hecho el pago, puede volver a <http://mexico.usvisa-info.com> o llamar al centro de llamadas para programar su cita. Puede tomar dos horas para que el pago sea válido en el sistema.
6. Debe usar esta ficha de depósito para hacer un pago en uno de los bancos enumerados arriba antes de la fecha de vencimiento.
7. Para cualquier asunto, por favor visite <http://mexico.usvisa-info.com> y haga clic en **CONTÁCTENOS** para enviar una consulta.

**Los pagos para Solicitud de Visa (MRV)  
no son reembolsables e intransferibles.**

Una vez pagada, esta cuota es válido por un año a partir de la fecha de pago y sólo puede ser usado para solicitudes de visa para los EE.UU. en México.







# NOTA DE REMISIÓN

No. \_\_\_\_\_

a \_\_\_\_\_ de \_\_\_\_\_ de \_\_\_\_\_

Sr. \_\_\_\_\_

Domicilio \_\_\_\_\_

Ciudad Carlos Jurado Rangel

Condiciones \_\_\_\_\_ Conducto \_\_\_\_\_

CANTIDAD	ARTÍCULO	PRECIO	IMPORTE
	Hospedaje y Alimentos		
1 al 5 agosto			1800
PAGADO			

DEROTAMOS Y PAGAREMOS (MOS) INCONDICIONALMENTE Y SIN PROTESTA A LA ORDEN DE  
EN ESTA PLAZA EL DÍA \_\_\_\_\_ DE \_\_\_\_\_ DE \_\_\_\_\_ A LA VISTA LA CANTIDAD QUE IMPORTE ESTA REMISIÓN, ASÍ  
COMO ESTAMOS DE ACUERDO EN QUE ESTE PAGARE CAUSARÁ INTERESES MORATORIOS A LA RAZÓN  
DE \_\_\_\_\_ % (POR CIENTO) SOBRE SU IMPORTE TOTAL O PARCIAL EN SU CASO, IGUALMENTE QUE PAGAREMOS SIN  
EXCUSA LA PRETERCITA, ASÍ COMO LOS GASTOS JUDICIALES Y LOS DE ENTORNO JUDICIALES QUE LEO ADOPTA LA FORMA  
PUESTA EN CUALQUIER LUGAR SE CONSIDERA COMO ACEPTACIÓN DE ESTA FACTURA

SUB-TOTAL 1800

I.V.A. \_\_\_\_\_

TOTAL \_\_\_\_\_

Recibí \_\_\_\_\_

estrella

CO. FILE DEPT. CLOCK NUMBER  
4EI 000074 101552 0013883473 1

022-0002

GREAT LAKES KRAUT CO, LLC  
158 E. NORTHLAND AVE  
APPLETON, WI 54911

## Earnings Statement



Period Beginning: 08/08/2011  
Period Ending: 08/14/2011  
Pay Date: 08/18/2011

Taxable Marital Status: Married  
Exemptions/Allowances:  
Federal: 1  
WI: 1

CARLOS JURADO RANGEL  
421 TELLOCK  
BEAR CREEK, WI 54922

Earnings	rate	hours	this period	year to date
Regular	10.3600	26.50	274.54	274.54
<b>Gross Pay</b>			<b>\$274.54</b>	274.54

### Important Notes

YOUR COMPANY'S PHONE NUMBER IS 920-560-6458

Deductions	Statutory	
Federal Income Tax	-5.15	5.15
Social Security Tax	-11.53	11.53
Medicare Tax	-3.98	3.98
WI State Income Tax	-7.41	7.41
<b>Other</b>		
Meals/Housing	-75.00	75.00
<b>Net Pay</b>	<b>\$171.47</b>	

Your federal taxable wages this period are \$274.54

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CO. FILE DEPT. CLOCK NUMBER  
4EI 000074 101552 0014005461 1

## Earnings Statement



045-0002

GREAT LAKES KRAUT CO, LLC  
158 E. NORTHLAND AVE  
APPLETON, WI 54911

Period Beginning: 09/12/2011  
Period Ending: 09/18/2011  
Pay Date: 09/22/2011

Taxable Marital Status: Married  
Exemptions/Allowances:  
Federal: 1  
WI: 1

CARLOS JURADO RANGEL  
421 TELLOCK  
BEAR CREEK, WI 54922

Earnings	rate	hours	this period	year to date
Regular	10.3600	49.00	507.64	2,439.78
Overtime	15.5400	11.90	184.93	217.56
<b>Gross Pay</b>			<b>\$692.57</b>	<b>2,657.34</b>

### Important Notes

YOUR COMPANY'S PHONE NUMBER IS 920-560-6458

Deductions	Statutory	
Federal Income Tax	-54.08	139.02
Social Security Tax	-29.09	111.61
Medicare Tax	-10.04	38.53
WI State Income Tax	-38.60	116.81
<b>Other</b>		
Meals/Housing	-75.00	450.00
<b>Net Pay</b>		<b>\$485.76</b>

Your federal taxable wages this period are \$692.57

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**Cristobal Martinez Velez**

I am Cristobal Martinez Velez and I am more than 18 years of age. I am competent to testify about the matters stated herein and, under penalty of perjury of the laws of the United States of America, I swear that the following statements are true and correct:

1. I was born on July 25, 1964. Spanish is my first language. I do not speak or understand English.
2. I went to school through the 3rd grade.
3. I come from Cortazar, Mexico, which is a small town in central Mexico in the state of Guanajuato. That is where I am currently living.
4. Many people in my area are farmers, and most families do not have very much money, including mine.
5. In my town in Mexico, the mail is slow and very unreliable. It is difficult and expensive for me to make international calls or to send international faxes. I know most of the other GLK workers also live in small towns where mail is not reliable, and it is difficult and expensive to make international calls or to send international faxes.
6. I do not understand my legal rights in the United States.
7. I worked at Great Lakes Kraut, or "GLK," at the sauerkraut cannery in Bear Creek, Wisconsin in 2008, 2010, and 2011.
8. There were about 100 workers from Mexico at GLK in both 2010 and 2011. The majority of us were trim line operators, which means we cut the stem out of heads of cabbage using drills and knives. A few visa workers from Mexico also helped the cook prepare meals and operated a forklift. The H-2B workers traveled in groups from Mexico to Wisconsin. We all lived in dormitory buildings very near the GLK plant. We worked together and ate all of our meals together.

9. I do not know the full names and addresses of many of the other visa workers.

**Expenses for 2010 Employment**

10. In 2010, I gave a copy of my passport to Elias Vera, who works for GLK. Elias Vera told me that to work for GLK that year I needed to pay a *derecho a visa* fee and take a bus with other workers to an American consulate in Mexico City to get our work visas.

11. In 2009, I paid \$1,800 Mexican pesos for a visa that I did not use. So in 2010, I only had to pay \$150 Mexican pesos for *derecho a visa*. I paid this at a Banamex in a town near where I live.

12. After paying the *derecho a visa* fee, I paid the bus driver \$350 Mexican pesos for a bus from Cortazar to Mexico City. Elias Vera arranged for the bus. I saw several other workers pay the bus driver just before boarding. There were about 50 people on the bus from Cortazar to Mexico City. I found out from talking to several people that we were all going to work for GLK. I knew several of these workers from my town and from nearby towns, and from the year I had worked at GLK in the past. There were other people on the bus from towns who I did not know.

13. The bus took us to a hotel in Mexico City. The hotel was called Jardin Amazonas. A paper with hotel information and instructions for GLK workers is attached.

14. A person named Jorge talked to all of the GLK workers at the hotel. Jorge told us that we had appointments at the American consulate to get our visas. Jorge helped us complete our paperwork at the hotel. A copy of my visa is attached.

15. I can't recall but I think I paid Jorge \$25 Mexican pesos for his assistance. I saw other GLK workers pay Jorge.

16. We stayed at the hotel in Mexico City for approximately 4-5 nights until all the GLK workers at the hotel with me got their visas. I paid the hotel bill at the reception desk. The hotel cost \$200 Mexican pesos per night. I saw other workers paying the hotel reception.
17. I spent approximately \$90 Mexican pesos per day on food while we were in Mexico City
18. Jorge told us we had to take a bus from Mexico City to Matamoros, Mexico to cross the border into the U.S. I paid \$600 Mexican pesos for the bus from Mexico City to Matamoros. I saw other workers pay for the bus. All of the passengers on the bus were GLK workers.
19. On the day we left Mexico City, Jorge made use pay him another \$50 U.S. dollars – in addition to the \$600 Mexican pesos we were paying for the bus to Matamoros. He also made us sign a paper at that time.
20. The bus took us to the Hotel Venezia in Matamoros. We stayed there for one night while we waited for GLK to arrange transportation to Wisconsin. I believe that all of the GLK workers stayed in the same hotel in Matamoros as I did, although we were not all there at the same time.
21. I do not recall how much I paid for this hotel but it included food. I saw other workers pay the hotel manager.
22. As best as I can recall, a bus picked us up at the hotel. I believe the bus was paid for by GLK. Before entering the United States, all of the workers, including me, paid \$6.00 U.S. dollars as a border entry fee. I saw many other workers pay this fee at the border.
23. It took about two days to drive from the border to Wisconsin. We all had to pay for our own food during the trip; I myself spent about \$50 U.S. dollars for my food.
24. Altogether, I spent approximately \$106 U.S. dollars and at least \$2,285 Mexican pesos in order to work at GLK in 2010, including the *derecho a visa* fee; transportation; lodging in

Mexico City and meals throughout my trip. This amount does not include my lodging in Matamoros. In total, I believe that these expenses amounted to approximately \$284 U.S. dollars.

25. When we arrived at GLK, we did not work for the first one or two weeks.

26. Once we started working, GLK paid us every week. I worked approximately 41 hours during my first week of work at GLK in 2010 and was paid approximately \$327 gross. A copy of my paycheck for the pay period ending August 22, 2010 is attached. In that first paycheck, I was not reimbursed for any of the money that I spent in order to work for GLK. Deducting my expenses from this amount means I was paid much less than minimum wage during the first week of work.

27. In my second paycheck in 2010, I was paid an extra \$121 in addition to my wages for hours worked. A copy of my paycheck for the pay period ending August 29, 2010 is attached. I was not told why this extra amount was included in that paycheck. This extra amount did not cover all of the money I had paid in order to work at GLK.

28. I talked with many of the other workers about how much it cost to get to work at GLK and that we were not reimbursed except for the approximately \$121 after the second week of work. No one I talked to said they were reimbursed any other amount, or reimbursed earlier.

29. When I went to work for GLK in 2010, I believed that I would work from August through November. I expected to work that entire period in order to make enough money to pay for what I spent to get the job and to earn money. In addition to my own money, I borrowed about \$8,000 Mexican pesos to pay the required expenses.

30. Instead of offering work until November, GLK told us in early October that there was no work. After being told this, I left along with the other visa workers.

#### **Expenses for 2011 Employment**

31. In 2011, Elias Vera told me that in order to work for GLK in 2011, I needed to pay a *derecho a visa* fee of \$1,950 Mexican pesos to get a work visa, pay him \$35 Mexican pesos to fax copies of my passport to GLK or the U.S. Consulate, and take a bus with other workers to Matamoros, Mexico to get our work visas.

32. Elias Vera told me and other workers to go to an internet café in Jaral del Progreso, a town nearby, to pay the *derecho a visa* fee. My wife went to the café to pay the fee for me. My wife told me that the woman at the café filled out some information on the computer and gave my wife a printed piece of paper and told my wife to take it to a bank nearby. A copy of the printed deposit slip is attached. She charged my wife \$30 Mexican pesos for this transaction.

33. My wife then went to Banamex and paid \$1,950 Mexican pesos. She was given a small receipt from the bank, which Elias Vera later collected from me at the hotel in Matamoros. My wife paid \$20 Mexican pesos for the bus to and from Jaral del Progreso to make the *derecho a visa* payment.

34. I brought my passport to Elias and he made a copy and faxed the copy to the American consulate or to GLK. I had to pay Elias \$35 Mexican pesos for sending the fax.

35. A few days before several other GLK workers and I were leaving for Matamoros, Mexico we went to Elias Vera's house and paid him \$800 Mexican pesos for the bus to Matamoros. All the other workers I was with paid either Elias or his wife \$800 Mexican pesos for the bus.

36. There were about 40 people on the bus with me plus a van with about 15 people also going to Matamoros. I learned from speaking with other workers on the bus that we were all going to work for GLK. I knew several of these workers from my town and from nearby towns, and from previous years I worked at GLK.

37. The bus took us to the Hotel Venezia in Matamoros. While I was working in Wisconsin, I learned, from talking to other GLK workers, that they stayed at the same hotel before coming to Bear Creek.
38. Elias Vera, the hotel owner and the hotel owner's assistant were in charge of the GLK workers at the hotel. Elias told us that we had appointments at the American consulate to get our visas, and that we had to meet with a *licenciado* to complete our paperwork before going to the consulate.
39. Elias and the hotel owner arranged the meetings with the *licenciado*. I do not recall the *licenciado*'s name.
40. The other workers and I went in groups of four in taxis from the hotel to the *licenciado*'s house where he had his office. The hotel owner arranged taxis to take us to the *licenciado*'s office, and we each paid \$30 Mexican pesos for the round-trip in the taxis.
41. I paid \$100 Mexican pesos to the *licenciado* for his help with my visa paperwork.
42. The day after meeting with the *licenciado*, we went in groups of about 20 to get our visas. The hotel owner arranged taxis to the consulate, and we each paid \$30 Mexican pesos for the round-trip in the taxis. We went on one day to be interviewed and then the next day a few workers went back to pick up the visas for everyone. A copy of my visa is attached.
43. We stayed at the hotel for about five days, until all 50 workers got their visas and GLK arranged transportation for me and the other workers from Matamoros to Wisconsin.
44. I paid the hotel \$1,800 Mexican pesos for lodging and meals. A copy of my receipt is attached. I saw other workers also pay the hotel owner and his assistant.
45. I paid Elias Vera another \$20 U.S. dollars that he said was for the *licenciado*.



46. Elias Vera told all of us when it was time to go to Wisconsin. We each paid \$30 Mexican pesos for the taxis to the border.

47. Before entering the United States, all of the workers, including me, had to pay \$6 U.S. dollars as a border entry fee. I saw lots of other workers pay this fee at the border. I also had to pay 50 cents for the officials to open a gate for me at the border.

48. GLK provided a bus from the American side of the border to Wisconsin. We left the border on about August 5, 2011 and arrived at GLK in Bear Creek, Wisconsin about two days later. Although I did not pay for this bus trip, I paid about \$50 U.S. dollars for my food during the two-day trip to Wisconsin.

49. GLK paid us every week.

50. I spent approximately \$76 U.S. dollars and \$4,860 Mexican pesos to work at GLK, including the *derecho a visa* fee; the *licenciado* fee; transportation; lodging and meals; and the border-entry fee. In total, I believe that these expenses amounted to approximately \$473 U.S. dollars.

51. I worked 26.5 hours during my first week of work at GLK in 2011, and was paid \$274.54 gross. A copy of my first pay check, for the pay period ending August 14, 2011, is attached. I spent more money to be able to work at GLK than I was paid for my first week of work.

52. I was never reimbursed for any of the money I paid in order to be able to work at GLK in 2011.

53. I talked with many of the other workers about how much it cost to get to work at GLK and that we were not reimbursed. No one I talked to said they were reimbursed.

### **Overtime**

54. I do not believe I was properly paid for the overtime I worked during my last week at GLK. I was paid the regular rate for at least 9 overtime hours worked. A copy of my last paycheck, for the pay period ending September 18, 2011, is attached.

55. I talked with several other visa workers, and they said they were also paid the regular rate for overtime hours worked in the last week.

### **Termination**

56. When Elias Vera recruited me to work for GLK in 2011, he said that I would work from August through November. I expected to work that entire period in order to make enough money to pay for what I spent to get the job and to earn money. In addition to my own money, I borrowed about \$650 U.S. dollars to pay the required expenses.

57. On approximately Monday, September 19, 2011, Rafael Jimenez Arroyo, a GLK supervisor, came into the kitchen with a list of people to be fired. My name was on this list.


58. The next day, all of the fired visa workers were told to leave GLK on a bus.

### VERIFICATION

I, Cristóbal Martínez Velez, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury under the laws of the United States of America that the foregoing statements are true and correct.

Yo, Cristóbal Martínez Velez, según 28 U.S.C. § 1746, declaro bajo pena de perjurio bajo las leyes de los Estados Unidos de América que las precedentes declaraciones son verdaderas y correctas.

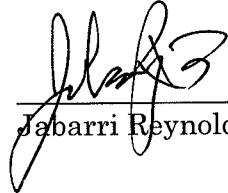
Date/Fecha: 19 de Mayo 2012

X 

\_\_\_\_\_  
Cristóbal Martínez Velez

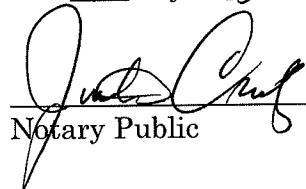
### CERTIFICATION OF COMPREHENSION

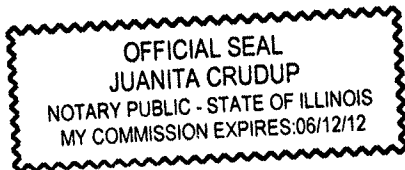
I, Jabarri Reynolds, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury under the laws of the United States of America that I am fluent in the English and Spanish languages and that I read the foregoing Affidavit of Cristobal Martinez Velez in Spanish to Mr. Martinez Velez and that he has confirmed that the Affidavit is true and correct.

  
Jabarri Reynolds

Dated: June 8<sup>th</sup>, 2012

SUBSCRIBED and SWORN to before me  
this 8<sup>th</sup> day of June, 2012.

  
Notary Public



Sernor Rafael el grupo de Agosto 10, 2010 debe presentarse en la ciudad de Mexico el dia

09 de agosto en Hotel Jardin Amazonas direccion

*Rio Amazonas 73 | Colonia Cuauhtemoc, Mexico*

*City 06500, Mexico*

*Telefono 01152-555-533-5950*

*Senor: Mondragón*

los trabajadores tienen que tener su pasaporte su derecho a visas su credencial de elector y una foto tamaño pasaporte tienen que llevar aproximadamente \$ 300.00 US para hotel comidas y la transportacion de la ciudad de Mexico a la frontera

Sernor Rafael el grupo de Agosto 12, 2010 debe presentarse en la ciudad de Mexico el dia

11 de Agosto en Hotel Jardin Amazonas es la misma direccion

los trabajadores tienen que tener su pasaporte su derecho a visas su credencial de elector y una foto tamaño pasaporte tienen que llevar aproximadamente \$ 300.00 US para hotel comidas y la transportacion de la ciudad de Mexico a la frontera

los trabajadores que tienen que ir a matamoros deben de presentarse en la ciudad de Mexico

con el grupo del dia 9 Agosto para llenar sus forma y darles las instrucciones necesarias.

TODO ESTE PROCESO SE TOMARA UNOS DOS DIA TOMAN LA ENTREVISTA EL DIA ANTES Y LE ENTREGAN LA VISA EL DIA SIGUIENTE LO MISMO PASA EN MATAMOROS LA ENTREVISTA EL DIA ANTES Y EL SIGUIENTE DIA LA VISA

YO VOY ESTAR PRESENTE CON LOS GRUPOS HACI SI ALGUIN TIENE ALGUNA PREGUNTA ME PUEDE DEJAR SABER

GRACIAS

JORGE GARCIA



CO. FILE DEPT. CLOCK NUMBER  
IB9 002671 506055 0012584882 1

050-0002

GREAT LAKES KRAUT CO., LLC  
11 CLARK STREET  
SHORTSVILLE, NY 14548

## Earnings Statement



Period Ending: 08/22/2010  
Pay Date: 08/26/2010

Taxable Marital Status: Married  
Exemptions/Allowances:  
Federal: 3  
WI: 3

CRISTOBAL MARTINEZ VELEZ  
421 TELLOCK  
BEAR CREEK, WI 54922

Earnings	rate	hours	this period	year to date
Regular	7.8500	40.00	314.00	314.00
Overtime	11.7750	1.10	12.95	12.95
<b>Gross Pay</b>			<b>\$326.95</b>	326.95

Deductions	Statutory		
	Social Security Tax	-20.27	20.27
	Medicare Tax	-4.74	4.74
	WI State Income Tax	-9.70	9.70
	<b>Other</b>		
	Meals/Housing	-64.29	64.29
	<b>Net Pay</b>	<b>\$227.95</b>	

Your federal taxable wages this period are \$326.95

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IB9 002671 506055 0012603333 1

051-0002

GREAT LAKES KRAUT CO., LLC  
11 CLARK STREET  
SHORTSVILLE, NY 14548

## Earnings Statement



Period Ending: 08/29/2010  
Pay Date: 09/02/2010

Taxable Marital Status: Married  
Exemptions/Allowances:  
Federal: 3  
WI: 3

CRISTOBAL MARTINEZ VELEZ  
421 TELLOCK  
BEAR CREEK, WI 54922

Earnings	rate	hours	this period	year to date
Regular	7.8500	35.70	280.25	594.25
Overtime				12.95
<b>Gross Pay</b>			<b>\$280.25</b>	<b>607.20</b>
<b>Deductions</b>				
<b>Statutory</b>				
Social Security Tax			-17.38	37.65
Medicare Tax			-4.06	8.80
WI State Income Tax			-6.96	16.66
<b>Other</b>				
Meals/Housing			-75.00	139.29
Reimbursement				-121.00
<b>Adjustment</b>				
Reimbursement			+121.00	
<b>Net Pay</b>			<b>\$297.85</b>	

Your federal taxable wages this period are \$280.25



**Ficha de Depósito CSC Servicios Consular EE.UU. MRV**

Número de Recibo (MRV): 2034200587 (Referencia Numérica)



Cantidad por Cargo: \$Pesos 1950.00

Número de Cargos: 1

**Cantidad Total del Depósito: \$Pesos 1950.00**

Fecha de Vencimiento de la Ficha de Depósito: 2011-08-26

Convenio 1545  
CSC Consular Services  
Realice su depósito en  
cualquier sucursal  
Sólo efectivo



Suc - Cuenta: 023 - 3047007  
Referencia Alfanumérica BD20110826RATE1950

CSC Consular Services  
Realice su depósito en  
cualquier sucursal  
Sólo efectivo



**Cómo pagar la cuota de Solicitud de Visa (MRV)**

1. No comparta las fichas de depósito. La cuota de la Solicitud de Visa es determinada por el tipo de visa que usted está solicitando. Verifique que la "Cantidad Total del Depósito" contiene la cantidad correcta.
2. El número de recibo debe ser único para validar el pago. Cada solicitante debe descargar una ficha de depósito única.
3. Imprima una copia de la ficha de depósito.
4. Guarde el recibo de pago que el cajero del banco le proporciona.
5. Una vez que haya hecho el pago, puede volver a <http://mexico.usvisa-info.com> o llamar al centro de llamadas para programar su cita. Puede tomar dos horas para que el pago sea válido en el sistema.
6. Debe usar esta ficha de depósito para hacer un pago en uno de los bancos enumerados arriba antes de la fecha de vencimiento.
7. Para cualquier asunto, por favor visite <http://mexico.usvisa-info.com> y haga clic en **CONTÁCTENOS** para enviar una consulta.

**Los pagos para Solicitud de Visa (MRV)  
no son reembolsables e intransferibles.**

**Una vez pagada, esta cuota es válida por un año a partir de la  
fecha de pago y sólo puede ser usado para solicitudes de visa para  
los EE.UU. en México.**



# NOTA DE REMISIÓN

No.

a 05 de Agosto de 2011.

Sr.

Domicilio

Ciudad

## Condiciones

### Conducto

CANTIDAD	ARTÍCULO	PRECIO	IMPORTE
	Hospedaje/ Alimentos 1 <sup>ro</sup> al 5 agosto		1800-
	PAGADO		)

DEBEMOS Y PAGAREMOS INCONDICIONALMENTE Y SIN PROTESTA A LA ORDEN DE \_\_\_\_\_ EN ESTA PLAZA (L DIA \_\_\_\_\_ DE \_\_\_\_\_ DE \_\_\_\_\_ A LA VISTA LA CANTIDAD QUE IMPORTE ESTA REMISION, ASI COMO ESTAMOS DE ACUERDO EN QUE ESTE PAGARE CAUSARA INTERESES MORATORIOS A LA RAZON DE \_\_\_\_\_ % MENSUAL SOBRE SU IMPORTE (TOTAL O PARCIAL) EN SU CASO, MISMO QUE PAGAREMOS SIN EXCUSA NI PRETEXTO, ASI COMO LOS GASTOS JUDICIALES Y/O EXTRAJUDICIALES QUE LO ADMITAN LA FIRMA PUESTA EN CUALQUIER LUGAR SE CONSIDERA COMO ACEPTACION DE ESTA FACTURA

SUB-TOTAL

L.V.A.

TOTAL

Recibí

estrella

\$800 de Guanajuato a Matamoros

55 dolares de laredo a Guamaluato

*Venezia*  
HOTEL

AVE. FRANCISCO VILLA  
Y RIO NILO ESQ. No.1  
COL. TREVIÑO ZAPATA  
H. MATAMOROS, TAM.

TELEFONOS

(868) 814-54-54.

8) 814-54-54.  
RESERVACIONES (868) 814-51-46

hotel.venezia@hotmail.com

[www.hotelvenezia.com.mx](http://www.hotelvenezia.com.mx)

CO. FILE DEPT. CLOCK NUMBER  
4EI 000081 101552 0013883481 1

030-0002

GREAT LAKES KRAUT CO, LLC  
158 E. NORTHLAND AVE  
APPLETON, WI 54911

## Earnings Statement



Period Beginning: 08/08/2011  
Period Ending: 08/14/2011  
Pay Date: 08/18/2011

Taxable Marital Status: Married  
Exemptions/Allowances:  
Federal: 1  
WI: 1

CRISTOBAL MARTINEZ VELEZ  
421 TELLOCK  
BEAR CREEK, WI 54922

Earnings	rate	hours	this period	year to date
Regular	10.3600	26.50	274.54	274.54
<b>Gross Pay</b>			<b>\$274.54</b>	<b>274.54</b>

### Important Notes

YOUR COMPANY'S PHONE NUMBER IS 920-560-6458

Deductions	Statutory	
Federal Income Tax	-5.15	5.15
Social Security Tax	-11.53	11.53
Medicare Tax	-3.98	3.98
WI State Income Tax	-7.41	7.41
<b>Other</b>		
Meals/Housing	-75.00	75.00
<b>Net Pay</b>		<b>\$171.47</b>

Your federal taxable wages this period are \$274.54

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CO. FILE DEPT. CLOCK NUMBER  
4EI 000081 101552 0014005472 1

056-0002

GREAT LAKES KRAUT CO, LLC  
158 E. NORTHLAND AVE  
APPLETON, WI 54911

## Earnings Statement



Period Beginning: 09/12/2011  
Period Ending: 09/18/2011  
Pay Date: 09/22/2011

Taxable Marital Status: Married  
Exemptions/Allowances:  
Federal: 1  
WI: 1

CRISTOBAL MARTINEZ VELEZ  
421 TELLOCK  
BEAR CREEK, WI 54922

Earnings	rate	hours	this period	year to date
Regular	10.3600	49.00	507.64	2,439.78
Overtime	15.5400	11.80	183.37	217.56
<b>Gross Pay</b>			<b>\$691.01</b>	<b>2,657.34</b>

### Important Notes

YOUR COMPANY'S PHONE NUMBER IS 920-560-6458

Deductions	Statutory	
Federal Income Tax	-53.84	138.93
Social Security Tax	-29.02	111.61
Medicare Tax	-10.02	38.53
WI State Income Tax	-38.48	116.81
<b>Other</b>		
Meals/Housing	-75.00	450.00
<b>Net Pay</b>		<b>\$484.65</b>

Your federal taxable wages this period are \$691.01

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**J. Jesus Robles Medina**

I am J. Jesus Robles Medina and I am more than 18 years of age. I am competent to testify about the matters stated herein and, under penalty of perjury of the laws of the United States of America, I swear that the following statements are true and correct:

1. I was born on March 2, 1975. Spanish is my first language. I speak and understand very limited English.
2. I went to school through the 9<sup>th</sup> grade.
3. I come from Jaral del Progreso, Mexico, which is a small town in central Mexico in the state of Guanajuato. That is where I am currently living.
4. Many people in my area are farmers or small business owners, and most families, including mine, do not have very much money.
5. In my town in Mexico, the mail is slow and very unreliable. It is difficult and expensive for me to make international calls or to send international faxes. I know most of the other GLK workers also live in small towns where mail is not reliable, and it is difficult and expensive to make international calls or to send international faxes.
6. I do not understand my legal rights in the United States.
7. I worked for Great Lakes Kraut or "GLK" in 2003, 2010 and 2011.
8. There were about 100 workers from Mexico at GLK in both 2010 and 2011. The majority of us were trim line operators, which means we cut the stem out of heads of cabbage using drills and knives. A few visa workers from Mexico also helped the cook prepare meals and operated a forklift. The H-2B workers traveled together in groups from Mexico to Wisconsin. We all lived in dormitory buildings very near the GLK plant. We worked together and ate all of our meals together.
9. I do not know the full names and addresses in Mexico of many of the other visa workers.

### **Expenses for 2010 Employment**

10. In 2010, Rafael Jimenez Arroyo, who works for GLK, told me that to work for GLK that year I would need to pay for a *derecho a visa* fee to get a work visa and take a bus with other workers to the American consulate in Mexico City.
11. Prior to going to Mexico City to get my work visa, my brother, Eduardo Robles Medina, arranged for me to get a *derecho a visa*. I gave him \$1,950 Mexican pesos so that he could pay the *derecho a visa* fee for me. As I understood it, this payment allowed me to get a work visa, which I needed to go to Wisconsin to work for GLK.
12. Elias Vera, who also works for GLK, arranged for the bus to take us from Santiago Capitiro to Mexico City. My brother and I each paid the bus driver \$800 Mexican pesos for the bus.
13. There were about 40 people on the bus from Santiago Capitiro to Mexico City. I found out from talking to several people that we were all going to work for GLK. I knew several of these workers from my town and from nearby towns, and from the years I had worked at GLK in the past. There were other people on the bus from towns who I did not know. Elias Vera rode the bus with us.
14. The bus took us to a hotel in Mexico City. I do not remember the name of the hotel. I later learned, from talking to other GLK workers that all of the workers who came through Mexico City to work at GLK stayed in the same hotel that I did, although we were not all there at the same time.



15. A person named Jorge who told us he was a *licenciado* talked to all of the GLK workers at the hotel. Jorge told us that we had appointments at the American consulate to get our visas, and that we needed to complete paperwork before going to the consulate.
16. The other workers and I went in groups to an office to do our paperwork. I do not know who owned the office, but it had several computers. Several of us walked to that location.
17. I paid \$50 U.S. dollars to the Jorge for the paperwork. I saw other workers pay Jorge, but I am not sure how much.
18. We stayed at the hotel in Mexico for approximately 5 days until all the GLK workers at the hotel with me got their visas. A copy of my visa is attached.
19. I paid the hotel in Mexico City about \$1,500 Mexican pesos for lodging. I saw other workers paying the hotel manager for lodging.
20. I paid approximately \$800 Mexican pesos for food while in Mexico City.
21. Elias Vera told us when it was time to take a bus from Mexico City to Matamoros, Mexico to cross the border into the U.S. I do not remember how much I paid for the bus from Mexico City to Matamoros.
22. The bus took us to the Hotel Venezia in Matamoros. We stayed there for one night while we waited for GLK to arrange for our transportation from Matamoros to Wisconsin. I believe that all of the GLK workers stayed in the same hotel in Matamoros as I did, although we were not all there at the same time.
23. I paid the hotel manager in Matamoros \$400 Mexican pesos for lodging and meals. I saw other workers pay the hotel manager.
24. Before entering the United States, all of the workers, including me, paid \$6.00 U.S. dollars as a border entry fee. I saw many other workers pay this fee at the border.

25. After crossing the border, we boarded a bus that took us to Bear Creek, Wisconsin. I was not required to pay bus fare for this trip.

26. It took about two days to drive from the border to Wisconsin. We all had to pay for our own food during the trip; I spent about \$50 U.S. dollars for my food.

27. Altogether, I spent approximately \$106 U.S. dollars and \$5,450 Mexican pesos in order to work at GLK in 2010, including the *derecho a visa*; the *licenciado*, transportation; and lodging and meals. In total, I believe that these expenses amounted to approximately \$533 U.S. dollars.

28. GLK paid us every week. I cannot find copies of all of my 2010 paystubs. I have a copy of two paystubs from 2010, which are attached.

29. I grossed \$314 a week if there was no overtime. I do not recall working overtime during my first week of the 2010 season, but my paystub for the week ending October 17, 2010, my eighth week of work, indicates that I averaged \$441 gross per week. Deducting my expenses from this amount means I was paid much less than minimum wage during the first week of work.

30. My recollection is that I was not reimbursed for any of the money that I spent in order to work for GLK in my first paycheck. I do believe that at some point I was reimbursed \$121 by GLK. This extra amount did not cover all of the money I had paid in order to work at GLK.

31. I talked with many of the other workers about how much it cost to get to work at GLK and that we were not reimbursed except for the approximately \$121. No one I talked to said they were reimbursed any other amount, or reimbursed earlier.

32. When Rafael told me about coming to work for GLK in 2010, he said that I would work from August through November. I expected to work that entire period in order to make enough money to pay for what I spent to get the job and to earn money. In addition to my own money, I borrowed about \$6,000 Mexican pesos at 1.5% interest to pay the required expenses.

33. Instead of working until November, I left GLK in October because GLK told us there was no more work.

### **Expenses for 2011 Employment**

34. In 2011, Elias Vera instructed me on what I was required to do to work for GLK.

35. Following Elias Vera's instructions, I brought him a copy of my passport. I believe he told me he would fax it to the U.S. Consulate, but I am not certain. He may have told me it was going to be faxed to GLK. He charged me \$35 Mexican pesos for faxing my passport.

36. Next, following Elias Vera's instructions, I went with a group of other GLK workers to the town square to take a bus to Matamoros. I paid the bus driver \$900 Mexican pesos for the bus. I saw other workers pay the bus driver \$900 Mexican pesos for the bus.

37. There were about 30 people on the bus with me to Matamoros. I learned from speaking with other workers on the bus that we were all going to work for GLK. I knew several of these workers from my town and from nearby towns, and from previous years I worked at GLK.

38. The bus took us to the Hotel Venezia in Matamoros. We arrived at the hotel on about August 14, 2011.

39. The hotel owner was named Hugo. He told all the GLK workers that we had appointments at the American consulate to get our visas, and that we had to meet with a *licenciado* to complete our paperwork before going to the consulate.

40. Hugo arranged the meetings with the *licenciado* named Jorge.

41. The other workers and I went in groups of four in taxis from the hotel to the *licenciado's* house where he had his office. Hugo arranged taxis to take us to the *licenciado's* office, and we each paid \$30 Mexican pesos for the round-trip in the taxis.

42. I paid \$100 Mexican pesos to the *licenciado* for help with paperwork.

43. I made a deposit with Jorge of \$150 U.S. dollars to pay for the *derecho a visa*. After I received my visa, Jorge returned \$130 U.S. dollars to me. Jorge charged me the \$20 U.S. dollars difference as part of his fee.
44. The day after meeting with the *licenciado*, we went in groups of about 20 to get our visas. Hugo arranged taxis to the consulate, and we each paid \$30 Mexican pesos for the round-trip in the taxis. We went on one day to be interviewed and then the next day a few workers went back to pick up the visas for everyone.
45. We stayed at the hotel for about a week, until all of the workers with me at the hotel got their visas and GLK arranged transportation from Matamoros to Wisconsin. A copy of my visa is attached.
46. I paid the hotel \$1,800 Mexican pesos for lodging and meals. I saw other workers also pay the hotel owner and his assistant.
47. Hugo arranged for taxis to take us to the border. We each paid \$30 Mexican pesos for the taxis to the border.
48. Before entering the United States, all of the workers, including me, had to pay \$6 U.S. dollars as a border entry fee. I saw lots of other workers pay this fee at the border.
49. GLK provided a bus from the American side of the border to Wisconsin. It took about two days to get to Wisconsin. Although I did not pay for this bus trip, I paid about \$50 U.S. dollars for my food during the two-day trip to Wisconsin.
50. GLK paid us every week.
51. I spent approximately \$76 U.S. dollars and \$2,925 Mexican pesos in order to work at GLK, including the money that I paid the *licenciado*; hotel, meal and taxi charges in Matamoros;

the border-entry fee, and the amount I spent on food during the trip from Mexico to Wisconsin.

In total, I believe that these expenses amounted to approximately \$315 U.S. dollars.

52. All of the 2011 paystubs I have are attached. I grossed \$414.00 per week with no overtime. I am almost certain I did not work overtime my first week. That means I spent almost as much to work at GLK as I was paid during my first week of work.

53. I was never reimbursed for any of the money I paid in order to be able to work at GLK in 2011.

54. I talked with many of the other workers about how much it cost to get to work at GLK and that we were not reimbursed. No one I talked to said they were reimbursed.

### **Overtime**

55. I do not believe I was properly paid for the overtime I worked during my last 2 weeks at GLK. According to those paystubs, I was paid the regular rate for 49 of the hours I worked the week ending September 18, 2011 and for the pay period ending September 25, I was paid the regular rate for 71 hours of work. Those paystubs are attached.

56. I talked with several other visa workers, and they said they were also paid the regular rate for overtime hours worked in the last weeks.

### **Termination**

57. When Elias Vera told me about coming to work for GLK in 2011, he said that I would work for at least three months. I expected to work that entire period in order to make enough money to pay for what I spent to get the job. In addition to my own money, I borrowed about \$6,500 Mexican pesos at 5% interest to pay the required expenses.

58. In the middle of September, Rafael posted a list in the kitchen of people to be fired. My name was not on this list. The people on that list were forced to leave the next day.

59. At the end of September, Rafael posted a list of the rest of the visa workers from Mexico, including me, to be fired.

60. The next day, all of the fired visa workers were told to leave GLK on a bus.

### VERIFICATION

I, J. Jesús Robles Medina, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury under the laws of the United States of America that the foregoing statements are true and correct.

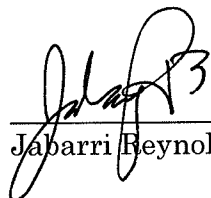
Yo, J. Jesús Robles Medina, según 28 U.S.C. § 1746, declaro bajo pena de perjurio bajo las leyes de los Estados Unidos de América que las precedentes declaraciones son verdaderas y correctas.

Date/Fecha: 19-Mayo-12

X *J. Jesús Robles Medina*  
J. Jesús Robles Medina

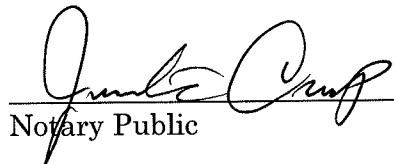
### CERTIFICATION OF COMPREHENSION

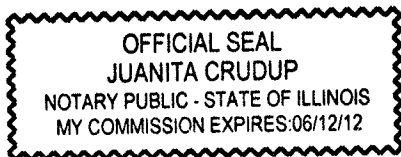
I, Jabarri Reynolds, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury under the laws of the United States of America that I am fluent in the English and Spanish languages and that I read the foregoing Affidavit of J. Jesus Robles Medina in Spanish to Mr. Robles Medina and that he has confirmed that the Affidavit is true and correct.

  
\_\_\_\_\_  
Jabarri Reynolds

Dated: June 8<sup>th</sup>, 2012

SUBSCRIBED and SWORN to before me  
this 8<sup>th</sup> day of June, 2012.

  
\_\_\_\_\_  
Notary Public







CO. FILE DEPT. CLOCK NUMBER  
IB9 002692 555011 0012785223 1

049-0002

GREAT LAKES KRAUT CO., LLC  
11 CLARK STREET  
SHORTSVILLE, NY 14548

## Earnings Statement



Period Ending: 10/17/2010  
Pay Date: 10/21/2010

Taxable Marital Status: Single  
Exemptions/Allowances:  
Federal: 5  
WI: 5

JESUS ROBLES MEDINA  
421 TELLOCK  
BEAR CREEK, WI 54922

Earnings	rate	hours	this period	year to date
Regular	7.8500	40.00	314.00	2,810.30
Overtime	11.7750	27.30	321.46	1,163.37
<b>Gross Pay</b>			<b>\$635.46</b>	<b>3,973.67</b>

Deductions	Statutory	
Federal Income Tax	-21.01	56.78
Social Security Tax	-39.40	246.37
Medicare Tax	-9.22	57.62
WI State Income Tax	-32.86	171.31
<b>Other</b>		
Meals/Housing	-75.00	664.29
Reimbursement		-121.00
<b>Net Pay</b>		<b>\$457.97</b>

Your federal taxable wages this period are \$635.46

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054-0002

GREAT LAKES KRAUT CO., LLC  
11 CLARK STREET  
SHORTSVILLE, NY 14548

## Earnings Statement



Period Ending: 10/24/2010  
Pay Date: 10/28/2010

Taxable Marital Status: Single  
Exemptions/Allowances:  
Federal: 5  
WI: 5

JESUS ROBLES MEDINA  
421 TELLOCK  
BEAR CREEK, WI 54922

Earnings	rate	hours	this period	year to date
Regular	7.8500	40.00	314.00	3,124.30
Overtime	11.7750	47.00	553.43	1,716.80
<b>Gross Pay</b>			<b>\$867.43</b>	<b>4,841.10</b>

Deductions	Statutory	
Federal Income Tax	-55.81	112.59
Social Security Tax	-53.78	300.15
Medicare Tax	-12.58	70.20
WI State Income Tax	-49.58	220.89
<b>Other</b>		
Meals/Housing	-75.00	739.29
Reimbursement		-121.00
<b>Net Pay</b>		<b>\$620.68</b>

Your federal taxable wages this period are \$867.43



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074-0002

GREAT LAKES KRAUT CO, LLC  
158 E. NORTHLAND AVE  
APPLETON, WI 54911

## Earnings Statement



Period Beginning: 09/12/2011  
Period Ending: 09/18/2011  
Pay Date: 09/22/2011

Taxable Marital Status: Married  
Exemptions/Allowances:  
Federal: 1  
WI: 1

JESUS ROBLES MEDINA  
421 TELLOCK  
BEAR CREEK, WI 54922

Earnings	rate	hours	this period	year to date
Regular	10.3600	49.00	507.64	1,750.84
Overtime	15.5400	2.60	40.40	55.94
<b>Gross Pay</b>			<b>\$548.04</b>	<b>1,806.78</b>

### Important Notes

YOUR COMPANY'S PHONE NUMBER IS 920-560-6458

Deductions	Statutory	
Federal Income Tax	-32.50	146.61
Social Security Tax	-23.01	75.88
Medicare Tax	-7.95	26.20
WI State Income Tax	-27.33	84.98
<b>Other</b>		
Meals/Housing	-75.00	300.00
<b>Net Pay</b>		<b>\$382.25</b>

Your federal taxable wages this period are \$548.04

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073-0002

GREAT LAKES KRAUT CO, LLC  
158 E. NORTHLAND AVE  
APPLETON, WI 54911

## Earnings Statement



Period Beginning: 09/19/2011  
Period Ending: 09/25/2011  
Pay Date: 09/29/2011

Taxable Marital Status: Married  
Exemptions/Allowances:  
Federal: 1  
WI: 1

JESUS ROBLES MEDINA  
421 TELLOCK  
BEAR CREEK, WI 54922

Earnings	rate	hours	this period	year to date
Regular	10.3600	71.00	735.56	2,486.40
Overtime	15.5400	5.40	83.92	139.86
<b>Gross Pay</b>			<b>\$819.48</b>	<b>2,626.26</b>

### Important Notes

YOUR COMPANY'S PHONE NUMBER IS 920-560-6458

Deductions	Statutory	
Federal Income Tax	-73.11	219.72
Social Security Tax	-34.42	110.30
Medicare Tax	-11.88	38.08
WI State Income Tax	-48.46	133.44
<b>Other</b>		
Meals/Housing	-75.00	375.00
<b>Net Pay</b>		<b>\$576.61</b>

Your federal taxable wages this period are \$819.48

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Enrique Rosas Jurado

I am Enrique Rosas Jurado and I am more than 18 years of age. I am competent to testify about the matters stated herein and, under penalty of perjury of the laws of the United States of America, I swear that the following statements are true and correct:

1. I was born on February 19, 1969. Spanish is my first language. I do not speak or understand English.
2. I went to school through the 11th grade.
3. I come from Santiago Capitiro, Mexico which is a small town in central Mexico in the state of Guanajuato. That is where I am currently living.
4. Many people in my area are farmers or small business owners, and most families, including mine, do not have very much money.
5. In my town in Mexico, the mail is slow and very unreliable. It is difficult and expensive for me to make international calls or to send international faxes. I know most of the other GLK workers also live in small towns where mail is not reliable, and it is difficult and expensive to make international calls or to send international faxes.
6. I do not understand my legal rights in the United States.
7. I worked for Great Lakes Kraut, or "GLK," in Bear Creek, Wisconsin in 2010 and 2011, and in several years prior to 2010.
8. There were about 100 workers from Mexico at GLK in both 2010 and 2011. The majority of us were trim line operators, which means we cut the stem out of heads of cabbage using drills and knives. A few visa workers from Mexico also helped the cook prepare meals and operated a forklift. The H-2B workers traveled together in groups from Mexico to Wisconsin. We all lived in dormitory buildings very near the GLK plant. We worked together and ate all of our meals together.



9. I do not know the full names and addresses in Mexico of many of the visa workers.

**Expenses for 2010 Employment**

10. In 2010, I gave Elias Vera, who works for GLK, a copy of my passport so that I could work at GLK. A copy of my passport is attached.

11. Following the instructions of a GLK supervisor, Rafael Jimenez Arroyo, I took a bus from Santiago Capitiro to Mexico City in early August 2010. I paid \$800 Mexican pesos for the bus but I cannot remember who I paid. I do recall other workers paying for the bus as we loaded the bus.

12. There were about 40 or 50 people on the bus from Santiago Capitiro to Mexico City. I learned from speaking with many of them that we were all going to work for GLK. I knew several of these workers from my town and from nearby towns, and from the years I had worked at GLK in the past.

13. The bus took us to a hotel in Mexico City. I know other GLK workers who came through Mexico City to work at GLK stayed at the same hotel in Mexico City, although we were not all there at the same time.

14. A person named Jorge talked to all of the GLK workers at the hotel. I believe Jorge was a *licenciado*. Jorge told all of us that we had appointments at the American consulate to get our visas. Jorge assisted all of us with our paperwork before going to the consulate.

15. I paid \$50 U.S. dollars to the *licenciado*. I saw other workers pay the *licenciado* this same amount.

16. We stayed at the hotel in Mexico City for about two or three days until all the GLK workers got their visas. A copy of my 2010 visa is attached.

17. I paid the hotel in Mexico City \$700 Mexican pesos for lodging. I saw other workers paying the hotel manager and his assistant. I also had to pay for meals while in Mexico City. I spent about \$500 Mexican pesos on food while I was in Mexico City.
18. GLK arranged for a bus from Mexico City to Matamoros, Mexico to cross the border into the U.S. I paid \$800 Mexican pesos for the bus from Mexico City to Matamoros. I saw other workers pay for the bus. All of the passengers on the bus were GLK workers.
19. The bus took us to a hotel in Matamoros. We stayed there for one night while we waited for GLK to arrange for our transportation from Matamoros to Wisconsin.
20. I paid the hotel manager in Matamoros \$300 Mexican pesos for lodging and meals there. I saw other workers paying the hotel manager.
21. To the best of my recollection, on approximately August 15, 2010, we were picked up at the hotel by a bus that took us over the border. We did not have to pay for this bus.
22. Before entering the United States, all of the workers, including me, had to pay \$6 U.S. dollars as a border entry fee. I saw many of the other workers paying this fee at the border.
23. After crossing the border, we boarded a bus that took us to Bear Creek, Wisconsin. I was not required to pay the bus fare for this part of the trip.
24. It took about two days to drive from the border to Wisconsin. The workers all had to pay for our own food during this trip; I myself spent about \$50-60 U.S. dollars for my food.
25. GLK paid us every week.
26. Altogether, I spent approximately \$106 U.S. dollars and \$3,100 Mexican pesos in order to work at GLK, including the *derecho a visa* fee; transportation; and lodging and meals. In total, I believe that these expenses amounted to approximately \$349 U.S. dollars.

27. My first week's paycheck shows that I worked 38.20 hours during my first week of work at GLK in 2010 and was paid \$299.87 gross, which was less than the \$349 U.S. dollars that I spent in order to work for GLK. In that first paycheck, I was not reimbursed for any of the amounts that I spent in order to work for GLK. A copy of that paycheck, for the pay period ending August 22, 2010, is attached.

28. In my second paycheck in 2010, I was paid an extra \$121 in addition to my wages. I was not told why this extra amount was included in that paycheck. Still, this extra amount did not cover all of the money I had paid in order to be able to work at GLK in 2010. A copy of that paycheck, for the pay period ending August 29, 2010, is attached.

29. I talked with many of the other workers about how much it cost to get to work at GLK and that we were not reimbursed except for \$121 after the second week of work. No one I talked to said he was reimbursed any other amount, or reimbursed earlier.

30. I believed I would work from August through November. I expected to work that entire period in order to make enough money to pay for what I spent to get the job and to earn money. In addition to my own money, I borrowed \$8,500 Mexican pesos at 10% interest to pay the required expenses.

31. Instead of offering work until November, Rafael told us in late September or early October, after I'd only been working for about five weeks, that there was no more work. After being told this, I left along with the other visa workers.

#### **Expenses for 2011 Employment**

32. In July 2011, I renewed my passport so that I could work at GLK. This cost me between \$1,050 to \$1,100 Mexican pesos. I brought a copy of my passport to Elias Vera who, I think, faxed it to GLK. A copy of my passport is attached.

33. Elias Vera sent me to an internet café to get a printout for purposes of getting a work visa. I took the printout to a Banamex in Jaral del Progreso. I cannot recall exactly, but I believe I paid \$1,800 Mexican pesos for the *derecho a visa* at the Banamex.
34. Several days after I paid for the *derecho a visa*, I took a bus with other workers from Santiago Capitiro to Matamoros, Mexico. I paid \$800 Mexican pesos to Elias Vera for the bus. I saw several other workers pay Elias Vera for the bus.
35. There were about 50 people on the bus from Santiago Capitiro to Matamoros. I learned from speaking with other workers on the bus that we were all going to work for GLK. I know several of these workers from my town and from nearby towns, and from previous years I worked at GLK.
36. The bus took us to the Hotel Venezia in Matamoros. I believe that all of the GLK workers stayed at the same hotel as I did, although we were not all there at the same time.
37. Elias Vera and a man who was the manager or owner of the hotel talked to all of the GLK workers at the hotel. Elias told all of us that we had appointments at the American consulate to get our visas. Elias also told us that we had to meet with a *licenciado* to complete our paperwork before going to the consulate.
38. Elias and the hotel owner or manager arranged meetings with the *licenciado*.
39. The other workers and I went in groups of four in taxis from the hotel to the *licenciado*'s house where he had his office. The hotel owner or manager arranged taxis to take us to the *licenciado*'s office, and we each paid \$30 Mexican pesos for the round trip in the taxis. After completing paperwork, we went to have our fingerprints and photographs taken.
40. I paid \$20 U.S. dollars to the *licenciado*. I saw other workers pay the *licenciado* as well.

41. The day after meeting with the *licenciado*, we went in groups of about 20 to get our visas. We each paid \$30 Mexican pesos for the round trip in the taxis. We all went on one day to be interviewed, and then the next day a few workers went back to pick up the visas for everyone.
42. We stayed at the hotel in Matamoros for about five days, until all the GLK workers got their visas and GLK arranged for transportation to Wisconsin. A copy of my visa is attached.
43. I paid the hotel \$1,800 Mexican pesos for lodging and meals. I saw other workers paying the hotel manager or owner and his assistant.
44. On approximately August 5, 2011, the hotel manager or owner arranged for taxis to take us to the border. We each paid \$30 Mexican pesos for the taxis to the border.
45. Before entering the United States, all of the workers, including me, had to pay \$6 U.S. dollars as a border entry fee. I saw many of the other workers paying this fee at the border.
46. From the border, we traveled by bus to Wisconsin. It took about two days to drive from the border to Wisconsin. Although I did not pay for this bus trip, I paid about \$50-60 U.S. dollars for my food during the trip.
47. GLK paid us every week.
48. In 2011, I spent approximately \$76 U.S. dollars and \$5,540 Mexican pesos to work for GLK, including the *derecho a visa* fee; transportation; lodging and meals. In total, I believe that these expenses amounted to approximately \$529 U.S. dollars.
49. I worked 32.30 hours during my first week of work at GLK in 2011, and was paid \$334.63 gross. A copy of my first pay check, for the pay period ending August 14, 2011, is attached. I spent more money to work at GLK than I was paid for my first week of work.
50. I was never reimbursed for any of the money I paid in order to be able to work at GLK in 2011.

**Overtime and Off-the-Clock**

51. I am not sure I was properly paid for the overtime I worked during my last week at GLK, the week ending September 18, 2011. I was paid the regular hourly rate for 49 of the hours that I worked that week. A copy of my last paycheck is attached.

52. When we received our last paycheck, I talked with several other visa workers who worked the same number of hours and received the same amount of pay as me for the last week of work.

53. On approximately Monday, September 19, 2011, Rafael came into the kitchen with a list of people to be fired. My name was on this list.

54. I worked all day on Monday, September 19, 2011. I received my last paycheck on Tuesday, September 20, just prior to boarding the bus. I do not believe I was paid for any of the approximately 8 hours I worked on September 19, 2011.

55. I learned from talking to other workers who were also fired on September 19, 2011, while we were on the bus to Laredo, they were also not paid for the hours they worked on that last day.

**Termination**

56. When I went to work for GLK, I believed I would work from August through November. I expected to work that entire period in order to make enough money to pay for what I spent to get the job and to earn money. In addition to my own money, I borrowed \$8,500 Mexican pesos at 10% interest to pay the required expenses.

57. The day after we were fired, all of the fired visa workers were told to leave GLK on a bus to Laredo, Texas.

### VERIFICATION

I, Enrique Rosas Jurado, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury under the laws of the United States of America that the foregoing statements are true and correct.

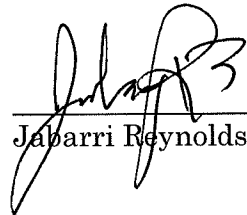
Yo, Enrique Rosas Jurado, según 28 U.S.C. § 1746, declaro bajo pena de perjurio bajo las leyes de los Estados Unidos de América que las precedentes declaraciones son verdaderas y correctas.

Date/Fecha: 19-Mayo-2017.

Enrique Rosas Jurado  
Enrique Rosas Jurado


### CERTIFICATION OF COMPREHENSION

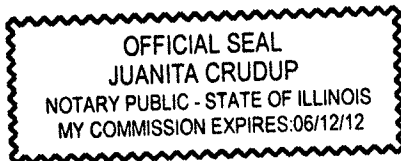
I, Jabbari Reynolds, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury under the laws of the United States of America that I am fluent in the English and Spanish languages and that I read the foregoing Affidavit of Enrique Rosas Jurado in Spanish to Mr. Rosas Jurado and that he has confirmed that the Affidavit is true and correct.

  
\_\_\_\_\_  
Jabbari Reynolds

Dated: June 8<sup>th</sup>, 2012

SUBSCRIBED and SWORN to before me  
this 8<sup>th</sup> day of June, 2012.

  
\_\_\_\_\_  
Notary Public





Le Ministère des Affaires Étrangères des États-Unis du Mexique prie les autorités compétentes de bien vouloir laisser passer librement et sans entrave le titulaire du présent passeport, de nationalité mexicaine, et de lui prêter toute aide et assistance possibles.

[illegible]

A black and white photograph of a postage stamp. The stamp features a detailed illustration of a building, possibly a church or a government building, with a central tower and arched windows. The building is surrounded by foliage. A circular postmark is stamped over the lower half of the stamp. The postmark contains the text 'AUG 15 2010' in the center, 'H23' in the middle, and 'Dec 10 2010' at the bottom. The words 'CITY' and 'UNIT' are visible on the left side of the postmark. The word 'Postmark' is written vertically on the right side of the image.

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CO. FILE DEPT. CLOCK NUMBER  
IB9 002696 506055 0012584911 1

079-0002

GREAT LAKES KRAUT CO., LLC  
11 CLARK STREET  
SHORTSVILLE, NY 14548

## Earnings Statement



Period Ending: 08/22/2010  
Pay Date: 08/26/2010

Taxable Marital Status:  
Federal: Single

Exemptions/Allowances:  
Federal: 3

ENRIQUE ROSAS JURADO  
421 TELLOCK  
BEAR CREEK, WI 54922

Earnings	rate	hours	this period	year to date
Regular	7.8500	38.20	299.87	299.87
<b>Gross Pay</b>			<b>\$299.87</b>	<b>299.87</b>

Deductions	Statutory		
	Social Security Tax	-18.59	18.59
	Medicare Tax	-4.35	4.35
	WI State Income Tax	-7.98	7.98
	<b>Other</b>		
	Meals/Housing	-64.29	64.29
	<b>Net Pay</b>	<b>\$204.66</b>	

Your federal taxable wages this period are \$299.87

### Additional Tax Withholding Information

Taxable Marital Status:  
WI: Married  
Exemptions/Allowances:  
WI: 3

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## Earnings Statement



GREAT LAKES KRAUT CO., LLC  
11 CLARK STREET  
SHORTSVILLE, NY 14548

080-0002

Period Ending: 08/29/2010  
Pay Date: 09/02/2010

Taxable Marital Status:  
Federal: Single

Exemptions/Allowances:  
Federal: 3

ENRIQUE ROSAS JURADO  
421 TELLOCK  
BEAR CREEK, WI 54922

Earnings	rate	hours	this period	year to date
Regular	7.8500	36.30	284.96	584.83
<b>Gross Pay</b>			<b>\$284.96</b>	<b>584.83</b>

Deductions	Statutory		
Social Security Tax	-17.67	36.26	
Medicare Tax	-4.13	8.48	
WI State Income Tax	-7.18	15.16	
<b>Other</b>			
Meals/Housing	-75.00	139.29	
Reimbursement		-121.00	
<b>Adjustment</b>			
Reimbursement	+121.00		
<b>Net Pay</b>		<b>\$301.98</b>	

Your federal taxable wages this period are \$284.96

### Additional Tax Withholding Information

Taxable Marital Status:  
WI: ☒ Married  
Exemptions/Allowances:  
WI: 3







CO. FILE DEPT CLOCK NUMBER  
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041-0002

GREAT LAKES KRAUT CO, LLC  
158 E. NORTHLAND AVE  
APPLETON, WI 54911

## Earnings Statement



Period Beginning: 08/08/2011  
Period Ending: 08/14/2011  
Pay Date: 08/18/2011

Taxable Marital Status: Married  
Exemptions/Allowances:  
Federal: 1  
WI: 1

ENRIQUE ROSAS JURADO  
421 TELLOCK  
BEAR CREEK, WI 54922

Earnings	rate	hours	this period	year to date
Regular	10.3600	32.30	334.63	334.63
<b>Gross Pay</b>			<b>\$334.63</b>	<b>334.63</b>

### Important Notes

YOUR COMPANY'S PHONE NUMBER IS 920-560-6458

Deductions	Statutory		
Federal Income Tax	-11.16		11.16
Social Security Tax	-14.05		14.05
Medicare Tax	-4.85		4.85
WI State Income Tax	-11.21		11.21
<b>Other</b>			
Meals/Housing	-75.00		75.00
<b>Net Pay</b>		<b>\$218.36</b>	

Your federal taxable wages this period are \$334.63

CO. FILE DEPT. CLOCK NUMBER  
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078-0002

GREAT LAKES KRAUT CO, LLC  
158 E. NORTHLAND AVE  
APPLETON, WI 54911

## Earnings Statement



Period Beginning: 09/12/2011  
Period Ending: 09/18/2011  
Pay Date: 09/22/2011

Taxable Marital Status: Married  
Exemptions/Allowances:  
Federal: 1  
WI: 1

ENRIQUE ROSAS JURADO  
421 TELLOCK  
BEAR CREEK, WI 54922

Earnings	rate	hours	this period	year to date
Regular	10.3600	49.00	507.64	2,499.87
Overtime	15.5400	11.20	174.05	279.72
<b>Gross Pay</b>			<b>\$681.69</b>	<b>2,779.59</b>

### Important Notes

YOUR COMPANY'S PHONE NUMBER IS 920-560-6458

Deductions	Statutory	
	Federal Income Tax	-52.44
	Social Security Tax	-28.63
	Medicare Tax	-9.88
	WI State Income Tax	-37.75
	<b>Other</b>	
	Meals/Housing	-75.00
<b>Net Pay</b>		<b>\$477.99</b>

Your federal taxable wages this period are \$681.69

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